

11 April 2024

RAAF Base Point Cook, Victoria
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Re: EPBC 2019-8514 - Preliminary Documentation Report, Demolition of Structures at RAAF Williams – Point Cook, Victoria

Dear Sir/Madam,

Thank you for the opportunity to respond to the above Preliminary Documentation (PD) Report under section 95A(3) of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

NATIONAL TRUST POSITION

We write on behalf the Australian Council of National Trusts, and the National Trust of Australia (Victoria) (National Trust) in objection to the current application for the demolition and removal of structures at RAAF Base Point Cook.

With 15 of the 19 buildings proposed for demolition considered to have some heritage significance under the sites National and Commonwealth Heritage listings, the National Trust believes this proposal presents a significant and irreversible threat to the national heritage values of the RAAF Base Point Cook.

We submit that the poor condition of the significant heritage buildings and the resulting request to demolish them demonstrates a case of "demolition by neglect," which is counter to the policy of the *RAAF Williams Point Cook Heritage Management Plan Draft* (ERM, 2018) (Draft HMP 2018),

*All prudent and feasible alternative to demolition must be examined when demolition of a heritage asset is proposed. Demolition to remove an ongoing maintenance requirement or WHS requirement is not sufficient justification alone.*¹

We submit the demolition of these buildings would signal an unacceptable double standard to the Australian community: that the Commonwealth Government allows the deterioration and resulting demolition of its own nationally significant heritage assets.

The National Trust implores the Department of Defence to abandon this proposal and engage a qualified Conservation Architect to assess the significant heritage buildings and undertake immediate stabilisation works as recommended.

¹ Quoted in *RAAF Base Point Cook Proposed Removal of Heritage Assets, Final Heritage Impact Assessment* (ERM, 2019)

We further recommend that the Department of Defence undertake assessments for recommended ongoing uses of all vacant and disused heritage buildings in line with the *RAAF Base Point Cook Heritage Management Plan* (ERM, 2020) (HMP 2020).

It is important to note, that the National Trust does not object to the demolition of the remaining 4 buildings that do not contribute to the National Heritage significance of the site.

BACKGROUND

The National Trusts of Australia (Australian Council of National Trusts) is the national body representing each state and territory National Trust. It is the peak heritage body in Australia responsible for advocating for better heritage funding and heritage policy outcomes for the Australian people.

The National Trust of Australia (Victoria) is the state's largest community-based heritage advocacy organisation actively working towards conserving and protecting heritage for future generations to enjoy, representing more than 40,000 members and supporters across Victoria. As Victoria's premier heritage and conservation organisation, the National Trust has an interest in ensuring that a wide range of natural, cultural, social and Indigenous heritage values are protected and respected, contributing to strong, vibrant and prosperous communities.

The National Trust has a long history of advocating for the protection of the RAAF Base Point Cook. The National Trust in Victoria classified the site at the level of international significance in 2004 ([B5572](#)), and has worked with stakeholders to campaign for its adequate conservation for over 20 years.

Since 2010 the National Trust in Victoria has warned that the lack of commitment to maintenance and appropriate reuse of heritage structures at the base were inadequate to ensure the protection of one of the most important heritage places in Australia.²

The National Trust in Victoria has also been campaigning against "demolition by neglect" for many years and has previously prepared a report on the issue of [Demolition by Neglect](#). The National Trust believes it is vital that all levels of heritage protection stand as a control that cannot be circumvented via deliberate disrepair.

HERITAGE PROTECTIONS

The RAAF Base Point Cook possesses the following classifications:

- National Trust (Victoria) [B5572](#) (International Level, no legislative controls)
- National Heritage List- [105671](#)
- Commonwealth Heritage List- [106002](#)

As the site is Commonwealth land it is exempt from local and state government jurisdictions and therefore cannot be included on the Victorian Heritage Register or local Heritage Overlay, however it is also included on the [Victorian War Heritage Inventory](#).

The National (NHL) and Commonwealth Heritage listings (CHL) recognise the outstanding heritage value of RAAF Base Point Cook to Australia as the oldest continuously operating

² National Trust of Australia (Victoria) Letter, *Re: RAAF Williams Point Cook Heritage Management Plan* (17 May 2010).

airfield in the world and the central role it has played in the development of the RAAF.³ The summary Statement of Significance for the NHL notes the following,

RAAF Base Point Cook is the only remaining World War One military airfield complex in Australia and features the oldest, most extensive complex of military aviation buildings in Australia. Together, the planning, layout and built fabric comprise the only example of a military air base associated with all the major formative periods of development: pre World War One, World War One, Inter-war and World War Two. The base includes uncommon examples of building types specific to each of these periods. In particular the fabric of the base includes examples of the oldest hangars and workshops, military or civilian, in Australia...This makes RAAF Base Point Cook perhaps the only remaining relatively intact early military airfield in the world. (Our emphasis)

The RAAF Base Point Cook listing also includes the following National Heritage Values: Criterion A, Events/Processes; Criterion B, Rarity; Criterion D, Principal characteristics of a class of places; Criterion G, Social value; Criterion H, Significant people.

The proposed action EPBC 2019-8514, includes the demolition of the following buildings included in the NHL and CHL:

- 122- Hazardous store
- 190- P1 Hut
- 203- P1 Hut
- 221- Store
- 228- Trainee Sleeping Quarters
- 243- RAAF College Classroom
- 485- Flying Club
- 125- P1 Huts
- 155- P1 Huts
- 156- P1 Huts
- 158- P1 Huts
- 211- Bellman Hanger
- 212- Bellman Hanger
- 213- Bellman Hanger
- 214- Bellman Hanger

IMPACT TO NATIONAL HERITAGE VALUES

Under the provisions for National heritage places (section 15B and 15C) and Commonwealth action (section 28),

A Commonwealth agency must not take an action that has, will have or is likely to have an adverse impact on the National Heritage values of a National Heritage place, or the Commonwealth Heritage values of a Commonwealth Heritage place, unless:

- *there is no feasible and prudent alternative to taking the action; and*
- *all measures that can reasonably be taken to mitigate the impact of the action on those values are taken.*

³ RAAF Williams Point Cook Heritage Management Plan 2012 update of 2008 HMP (ERM, 2012)

With regards to the proposed demolition, the National Trust is not satisfied that there is no feasible and prudent alternative, or that all measures that can reasonably be taken to mitigate the impact have been taken.

We believe the action proposed will have an adverse impact on the National and Commonwealth Heritage values of the RAAF Base Point Cook with particular regards to Criterion B, Rarity. The 15 heritage buildings proposed for demolition are unique surviving examples of aviation buildings from WWI to WWII.⁴

The National Trust objects to the proposal on the following basis:

- we strongly object to the demolition of 15 assets considered to have heritage significance under the NHL and CHL;
- all measures that can reasonably be taken to mitigate the impact of the action on the site's National and Commonwealth Heritage values have not been taken. The demolition of these structures has not been sufficiently justified and demonstrates a case of "demolition by neglect";
- it has not been demonstrated that there is no feasible and prudent alternative to taking the action as potential future uses for the buildings have not been meaningfully explored;
- we fundamentally disagree with the assessment that the cumulative impact of loss is diluted due to the Base containing a large collection of WWII buildings.⁵ The impact to the National and Commonwealth Heritage values of the site by demolishing multiple significant WWII buildings has been downplayed;
- in light of the above, we are not satisfied that the loss of National Heritage value of the Base 'as a whole' is significantly negated by the proposed mitigation measures⁶ should this action be allowed to proceed.

DEMOLITION BY NEGLECT

In 2013 the National Trust in Victoria commissioned a report on Demolition by Neglect, by Renee Muratore (the report).⁷ The report defines demolition by neglect as, 'The destruction of a building through abandonment or lack of maintenance.' It then goes on to describe the different types or reasons for demolition by neglect, such as inadvertent or accidental neglect,

Inadvertent Neglect is defined by an owner who is not intentionally neglecting their property for the purpose of redevelopment, but is failing to undertake regular maintenance or, in the case of vacant buildings, is failing to secure the property due to financial reasons. Whilst the neglect is not deliberate, the property still falls into a dilapidated and generally neglected state.

Additionally, the *Burra Charter 2013 (The ICOMOS Charter for Places of Cultural Significance)* (Burra Charter), sets out a standard for custodians and decision makers for places of cultural

⁴ RAAF Williams Point Cook Heritage Management Plan 2012 update of 2008 HMP (ERM, 2012)

⁵ Preliminary Documentation Report: Demolition of Structures at RAAF Williams – Point Cook, Victoria, (Department of Defence, 2023)

⁶ Preliminary Documentation Report: Demolition of Structures at RAAF Williams – Point Cook, Victoria, (Department of Defence, 2023)

⁷ Demolition by Neglect - Report & Policy on places in the Heritage Overlay (Renee Muratore, 2013)

significance. While the Burra Charter is not a statutory document, it is recognised in Australia as the best practice document to guide the conservation and management of places of cultural heritage significance.

*The Burra Charter advocates a cautious approach to change: do as much as necessary to care for the place and to make it useable, but otherwise change it as little as possible so that its cultural significance is retained.*⁸

Specifically, regarding maintenance the Burra Charter notes, 'Maintenance is fundamental to conservation. Maintenance should be undertaken where fabric is of cultural significance and its maintenance is necessary to retain that cultural significance.'

The RAAF Williams Point Cook Heritage Management Plan 2012 update of 2008 HMP (ERM, 2012) (HMP 2012) notes the following on potential risks to the National Heritage values of RAAF Base Point Cook,

2.4.1 Maintenance

The primary risk to the heritage values at Point Cook is through disuse, leading to lack of maintenance and repairs, consequently resulting in deterioration of building fabric. Unused buildings quickly deteriorate, and the location of the buildings at Point Cook in a marine environment, particularly those at the South Tarmac, will speed up the process of decline. Several buildings display signs of deterioration common to buildings that have been locked up and left vacant...The risk to buildings and elements of the site through disuse potentially results in buildings that are unsafe for use, unfit for purpose, and unattractive as restoration projects, often resulting in demolition as the most viable solution.

The RAAF Base Point Cook Proposed Removal of Heritage Assets, Final Heritage Impact Assessment (ERM, 2019) (HIA) states that 'Limited data on maintenance/repair costs for the heritage assets in question yielded only the observation that ongoing maintenance over the past ten years has been reactive rather than planned.' Considering the detailed maintenance guidelines, list of priority works, and five-year implementation plan supplied in the HMP 2012 the National Trust submits that the current poor condition of the heritage buildings proposed for demolition is a case of "demolition by neglect".

Therefore, the demolition of these buildings would signal an unacceptable double standard to the Australian community: that the Commonwealth Government allows the deterioration and resulting demolition of its own nationally significant heritage assets. It is also deeply concerning that a key policy of the HMP 2012 was that the HMP itself be implemented, and evidently this has not occurred.

REASONABLE ECONOMIC USE

The Department of Defence has a responsibility to protect and manage the heritage values at RAAF Base Point Cook in accordance with the *Defence Estate Heritage Strategy (2017)* (the strategy). With regards to budgeting the strategy states that, 'Maintenance works identified through HMPs or asset appraisal processes are prioritised with regard to Defence operational requirements, any additional conservation requirements, and urgency.' Additionally, the Draft HMP 2018 notes that, 'Demolition to remove an ongoing maintenance requirement or

⁸ Burra Charter 2013 (*The ICOMOS Charter for Places of Cultural Significance*)

because no funding will be allocated to provide minimum maintenance for the asset is not sufficient justification.⁹

Therefore, the National Trust submits that multiple uses of the argument that ‘repair and ongoing maintenance of [buildings] is not considered effective use of funding,¹⁰ is contradictory to the Draft HMP 2018 and by extension the *Defence Estate Heritage Strategy*.

Moreover, the reason many of the building repair and maintenance costs seem prohibitive now is due to a lack of implementation of the regular maintenance regime provided in the HMP 2012. The National Trust submits that costs due to a refusal to implement the policies of the site HMP for over a decade should not be paid for by the Australian community through the deterioration and loss of our nationally significant heritage places.

ALTERNATIVES TO DEMOLITION

Regarding demolition the Burra Charter states the following,

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. (Our emphasis)

The scope of the HIA 2019 referenced in the PD is outlined as follows,

This HIA has been prepared to assess the potential impacts on the National heritage (NH) and Commonwealth (CH) values of the RAAF Point Cook if the built assets are to be demolished. This report:

- *Incorporates findings of the structural engineering and quantitative surveying to inform determination on prudent and feasible options;*
- *Assess whether a referral in accordance with the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) is required; and*
- *Provides recommendations to manage and mitigate potential impacts on recognised heritage values.*

When discussing alternatives to demolition, in nearly all assessments it is concluded that retention of the buildings proposed for demolition is not considered prudent based on the high degree of cost for these assets without an identified future use.¹¹

The National Trust submits there is no evidence that the Department of Defence requested ERM or any other consultant to assess identified future use for the heritage buildings. Therefore, it cannot be demonstrated that the Department of Defence has meaningfully explored ‘feasible and prudent alternative’¹² to the proposed demolitions. Additionally, to then use this lack of identified future use as a justification for demolition of the buildings

⁹ Quoted in *RAAF Base Point Cook Proposed Removal of Heritage Assets, Final Heritage Impact Assessment* (ERM, 2019)

¹⁰ *Preliminary Documentation Report: Demolition of Structures at RAAF Williams – Point Cook, Victoria*, (Department of Defence, 2023)

¹¹ *RAAF Base Point Cook Proposed Removal of Heritage Assets, Final Heritage Impact Assessment* (ERM, 2019)

¹² Provisions for National heritage places (section 15B and 15C) and Commonwealth action (section 28).

does not uphold the obligations of the Department of Defence under the provisions for National heritage places (section 15B and 15C) and Commonwealth action (section 28).

This is particularly evident regarding the assessment for *Asset 122 Hazardous/inflammable store*, which was assessed and recommended for retention and re-use by ERM. However, the Department of Defence still determined the building should be demolished with the following reasoning,

*Defence has advised ERM that while the heritage significance of this asset is recognised, a new use has not been able to be identified. Defence has determined that refurbishment and re-use is not a prudent use of public funds.*¹³

This reasoning appears to pre-empt a decision to demolish the buildings, rather than meaningfully explore alternative options for their retention as recommended by ERM. Therefore, the National Trust submits the PD does not supply convincing evidence that there is no 'feasible and prudent alternative'¹⁴ to the demolition, instead the proposal has been presented as a *fait accompli*.

ADAPTIVE REUSE

The National Trust supports the adaptive reuse of heritage buildings to ensure they have an ongoing purpose and remain viable assets to their communities. In discussion of options for adaptive reuse of the heritage buildings the PD notes,

*...the poor physical state of many of the assets included in the proposed action would necessitate major alterations and repair works to maintain fire safety compliance and useability for occupants. **While this would retain the heritage values of the precinct, there would still be a heritage impact to the individual buildings through the loss of original fabric.*** (Our emphasis)

We submit that though major alterations and replacement of original fabric as a result of repair works to the heritage buildings would result in some heritage impact, such an impact is still preferable on balance to the alternative of complete demolition and subsequent total loss of the original fabric.

Moreover, we find such an argument is contradictory to the principles of heritage conservation. Indeed, the Burra Charter notes 'In some cases, reconstruction may also be appropriate as part of a use or practice that retains the cultural significance of the place.' Therefore, if adaptive reuse has not been assessed in line with the best practice guide for conservation and management of places of cultural heritage significance in Australia, it cannot be demonstrated that 'all measures that can reasonably be taken to mitigate the impact of the action on [the National Heritage] values [have been] taken.'¹⁵

Furthermore, when assessing reuse alternatives to demolition of the heritage buildings, the PD also notes,

¹³ RAAF Base Point Cook Proposed Removal of Heritage Assets, Final Heritage Impact Assessment (ERM, 2019)

¹⁴ Provisions for National heritage places (section 15B and 15C) and Commonwealth action (section 28).

¹⁵ Provisions for National heritage places (section 15B and 15C) and Commonwealth action (section 28).

Further, the retention and reuse of such buildings could inhibit future reactivation of some areas of the Base, limiting their ability to become operational and support the ongoing military function of the Base.

The National Trust submits that as reactivation of some areas of the Base is not included as a reason for the proposed demolition of the heritage buildings or referred to as a future management plan for the site in any documentation supplied with the PD, it is not a justifiable reason for demolition of any heritage structure on the site.

The National Trust also strongly objects to the PD assessment that,

The cumulative impact of loss on the broader NHL environment is diluted somewhat by the fact that the buildings under assessment form part of a larger collection of WWII buildings that demonstrate values at Base-wide level.

RAAF Base Point Cook is included on the NHL under Criterion B, Rarity, and multiple buildings proposed for demolition are noted under that listing as unique surviving examples of aviation buildings from WWII.¹⁶ Additionally, the Burra Charter notes the following when considering change to a place,

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. (Our emphasis)

HERITAGE MANAGEMENT

There has been some confusion regarding which document is the current Heritage Management Plan (HMP) for the site and which HMP is referred to in this PD. Though the PD references the RAAF Base Point Cook Heritage Management Plan (ERM 2018) as Attachment 3, this document, as well as Attachment 4, was missing from the original PD supplied by the Department of Defence under section 95A(3) of the EPBC Act.

The National Trust contacted the Department of Defence to inform them of the missing attachments and we were supplied with the HIA 2019 and HMP 2012 on 5 April 2024. The HIA 2019, further referenced a background document, ERM Australia, Pty Ltd, 2018. RAAF Williams Point Cook Heritage Management Plan (in draft). When we further enquired after the reference to a HMP 2018 document, the National Trust was informed this was an error in the PD and the reference should have been to the HMP 2012. The Department of Defence later located and provided the National Trust with the HMP 2020, though this document is not referenced in the PD or HIA 2019 that are the basis for this proposal.

In accordance with the EPBC Act, the Heritage Management Plan for RAAF Base Point Cook must be reviewed at least every five years.¹⁷ From the evidence above there appears to be an eight-year gap between finalisation and publishing the current RAAF Base Point Cook HMP.

¹⁶ RAAF Williams Point Cook Heritage Management Plan 2012 update of 2008 HMP (ERM, 2012)

¹⁷ RAAF Williams Point Cook Heritage Management Plan 2012 update of 2008 HMP (ERM, 2012)

Furthermore, it raises concerns regarding the staging of works in relation to the overall planning for RAAF Base Point Cook that the draft HMP 2018 was not a finalised or published document when the HIA 2019 was prepared. An up to date HMP must inform any decision that might impact the values of a significant heritage place and should provide guiding policies for considering such critical proposals as demolition of heritage assets. We are pleased that the 2012 HMP has been updated, however heritage management planning should not be driven by pre-determined outcomes, and the proposal for demolition of the buildings in 2019 prior to finalisation of the site HMP 2020 is deeply concerning.

Moreover, it still remains unclear which HMP is referred to in the PD. We submit that as the PD was written in November 2023, the most up to date and current HMP should be the guiding document for process and policy of this decision, not superseded or draft HMPs. We request confirmation from the Department of Defence which HMP is the current site HMP, and if it is the HMP 2020 as indicated, this document needs to be supplied with the PD in line with section 95A(3) of the EPBC Act/

We encourage that the Department of Defence ensure implementation of the policies and guidelines regarding maintenance, adaptive re-use and demolition, in the HMP 2020 to avoid future proposals of this nature. Additionally, we recommend an assessment for ongoing uses of all vacant and disused heritage buildings at RAAF Base Point Cook is undertaken as a matter of priority.

Conclusion

We respectfully call on the Department of Defence to abandon this proposal and undertake adequate assessment and stabilisation works for the retention of the significant heritage buildings.

It is the position of the National Trust that the proposal to demolish 15 significant heritage buildings under NHL and CHL listings, has not been justified and the proposed action should not be progressed or approved.

Should you require any clarification on our position, we welcome you to contact the National Trust at madeleine.moore@nattrust.com.au or on 03 9656 9879.

Yours faithfully,



Lachlan Molesworth
Chair
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