

Bulimba District Historical Society inc

**SUBMISSION TO THE
PARLIAMENTARY STANDING
COMMITTEE ON PUBLIC WORKS**

**HMAS MORETON UNIT
RELOCATION PROJECT**

HMAS Moreton, Bulimba, Queensland

26 April 2017

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1. Introduction

1. The Bulimba District Historical Society Inc (the Society) welcomes the opportunity to make this submission to the Parliamentary Standing Committee on Public Works in its inquiry into the HMAS Moreton Unit Relocation Project (the Project), HMAS Moreton (*Moreton*), Bulimba, Queensland.
2. The Society is named as a key stakeholder in a submission (Statement of Evidence), dated March 2017¹, which was made by the Department of Defence (Defence) in relation to the Project.
3. The Society is a voluntary community group with just over 40 members and was formed in 2012 to research the history of the Bulimba district. Members of the Society have amongst other projects, taken an interest in the military history of the Bulimba area including the site of the Bulimba Barracks Precinct². This precinct includes the Royal Australian Navy sub-precinct which is the Project area. The Society believes any work is not suitable for its purpose unless heritage investigations take into account indigenous and non-indigenous cultural and heritage significance and the community relationship with that heritage.
4. The primary focus of this submission is to address the “stated purpose of the proposed work and its suitability for that purpose”³ to ensure the Project undertakes Environment and Heritage Assessment relevant to key legislation and Defence systems and protocols.

2. Summary

5. The Society believes the Project is a positive maintenance of a long association over 70 years between the Bulimba district and Defence located in the Bulimba Barracks Precinct. This precinct is defined by its relationship with the Brisbane River and the river was the main factor in its development over time, including its Defence uses.
6. The history of the site predates European settlement and this prior history should be considered in any cultural and heritage assessment. The river at Bulimba on the Hamilton Reach was one of the significant crossing points for the original owners and custodians of the region of present-day Brisbane, Queensland.
7. Heritage, cultural and natural elements of the Bulimba Barracks Precinct (which includes both the project site, *Moreton*, at 100 Taylor Street, Bulimba and the property disposal site, Bulimba Barracks at 167 Apollo Road, Bulimba) meet criteria demonstrating cultural and heritage significance of not only local heritage significance but also Commonwealth and Queensland heritage significance. The site is an historic heritage place currently owned and controlled by the Australian Government which is connected to defence government activities. The Society

¹http://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Public_Works/HMASMoreton/Submissions

² <http://www.defence.gov.au/id/PropertyDisposals/Bulimba.asp>

³ http://www.aph.gov.au/Parliamentary_Business/Committees/House/Making_a_submission

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believes the cultural and heritage significance of the site contributed to Australia's development as a nation.

8. The Commonwealth through the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) requires heritage assessment to be undertaken and Defence has documented these requirements through its Defence Estate Quality Management System (DEQMS).
9. The Society understands some work has been undertaken in relation to the site's heritage values but the Society does not believe this work has been of sufficient detail to satisfy the cultural and heritage significance of the site and requirements of Commonwealth legislation and documented Defence requirements.

3. Recommendations

10. The Bulimba District Historical Society recommends, in its assessment of the HMAS Moreton Unit Relocation Project, HMAS Moreton, Bulimba, Queensland, the Parliamentary Standing Committee on Public Works:
 1. *Request Defence prepare a Heritage Management Plan for the Defence land that forms part of the Bulimba Barracks Precinct including the area included in the Project that complies with Legislation and Defence requirements including:*
 - *the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act);*
 - *Native Title Act 1993 (Cth); and*
 - *Defence Estate Quality Management System.*
 2. *Ensure Heritage investigations and consultation should be undertaken in such a manner and detail to satisfy statutory responsibilities and duties of care, under relevant legislation and consider the community relationship with the heritage.*
 3. *Ensure engagement with the original owners and custodians of the region of present-day Brisbane, Queensland, in any cultural and heritage assessment and development work plans including the boat ramp.*
 4. *Ensure engagement with the Chinese community to ensure special consideration is given to the cultural and heritage connection of this site to the Chinese involvement in assisting the defence of Australia during World War Two.*
 5. *Examine if any complete cultural and heritage assessment will result in the Precinct meeting one or more of the nine Commonwealth Heritage List criteria and need to be considered if advice should be referred to the Federal Minister for the Environment and the Australian Heritage Council.*

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6. *Request this project consider its cultural and heritage responsibilities are not limited to the specific area of the Project but need to recognise its linkage and consider an Easement area for a pedestrian and bicycle corridor link to the broader Bulimba Barracks Precinct and neighbouring properties along the river including to the east, Taylor Street Park and 153 Taylor Street, Bulimba (this site originally formed part of the Bulimba Barracks at the time of the Second World War site) and to the west, Byron Street Precinct and Apollo Road ferry.*

4. Site Importance to Bulimba Community and Australia

11. The Brisbane River is the dominant geographical feature that strongly influences the character of the Bulimba area to this day. From the time of its original inhabitants and continuing through European settlement the association with the river through fishing, transport, a sailing culture and development of a number of ship yards has reinforced this association. The previous industry associated with the river has now receded and the changing demographic of the area has embraced the river as a unique and highly desirable feature.
12. Over many decades and especially during World War Two (WW2) the area has also been closely associated with military operations and facilities. While this association is reducing through the same changes that have brought about the closure of the ship yards, it is positive that this connection will be continuing with the strengthening of the Naval facilities and this will ensure an ongoing military presence in the local area.
13. It would be disappointing if a 'new' military facility did not take account of the culture and heritage of the site including its military history, linkage between the community and the river.

5. Commonwealth and Department of Defence Requirements

14. The Commonwealth Government and Department of Defence have put in place legislation and protocols to ensure cultural and heritage values of sites and input from local communities are respected and recognised in existing facilities, any redevelopment and/or disposal process. Other Commonwealth owned Defence development sites, like Leeuwin Barracks in Western Australia, show there are exempla's in the implementation of these processes and Defence working in consultation with the community.
15. To initiate public community consultation on the Bulimba Barracks Precinct between the Commonwealth Government, Defence and the local community a member of the Society first contacted representatives of Defence in December 2016. The Society was not aware of Defence being involved in other direct public consultation in Bulimba. The Society only became aware of the *Moreton* project on 31 March 2017.
16. The Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities and heritage places and the Defence

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Estate Quality Management System (DEQMS) identifies Defence requirements in relation to this and other Acts and states in relation to Heritage Management:

“Defence seeks to manage heritage values on its estate consistent with the principles and requirements of Commonwealth heritage legislation. This includes the identification and management of risks to heritage during the planning, development and operation of Defence facilities (including bases and training areas).”⁴

17. While the Society understands the Project is addressing ongoing operational requirement for the Navy, it feels the following points should be considered by the committee when undertaking any assessment:
1. The area of the Project is part of a Bulimba Barracks Precinct (the Precinct) and is important in the cultural and heritage values of the Bulimba area and a broader Australian context.
 2. Maintaining an active link between the Military and the Bulimba area is a positive move and the Project will maintain such a link.
 3. Military forces, both Australian and International have had a long association with the Precinct in peace time and during multiple conflicts.
 4. Support for this and other Defence projects will be enhanced by transparency in the planning process, specifically in relation to the cultural and heritage values and support for ongoing community engagement with that heritage.
 5. Although the Project under consideration is specific to an area contained within the Precinct it cannot be considered without reference to the overall Precinct, the surrounding area and its culture and heritage, current and future development.
 6. The Project should be undertaken in a manner that makes a positive contribution to the community and recognition of the Precinct’s culture and heritage and connection links.
 7. To date, it appears Defence has not:
 - a. undertaken appropriate research to determine the cultural and heritage significance of the Precinct and Defence facilities contained within this Precinct;
 - b. conformed to the requirements identified by Defence;
 - c. given enough consideration to recognition of culture and heritage and how this can be preserved within the Bulimba community; and
 - d. appropriately addressed community concerns raised about links between the Precinct, neighbouring properties, emerging communities and development sites along the river.

6. Site Importance and Defence Actions related to Culture and Heritage

18. Under the EPBC Act Commonwealth agencies have a responsibility to undertake an assessment process to identify which of the places they own or control have

⁴ www.defence.gov.au/estatemangement/Governance/Policy/Environment/Heritage/default.asp

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Commonwealth Heritage values. Defence has developed a toolkit⁵ to assist officers comply with the requirements of the EPBC Act and it states that:

“for Defence to comply with requirements under Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) legislation (for sites on the Commonwealth Heritage List (CHL); and/or to protect and manage the heritage values of sites (both heritage listed and even some not listed) during strategic and master planning, development, redevelopment, maintenance and refurbishment.”

19. The Defence toolkit also recognises some sites are not on the Commonwealth Heritage List, but still require a Heritage Management Plan to appropriately protect any identified heritage values. Under the EPBC Act, these sites may be picked up under section 28 which states that a Commonwealth agency cannot take an action that has, will have or is likely to have, a significant impact on the environment, which now formally includes heritage.
20. When meeting with the Project representatives the Society were advised they had not and did not believe it is appropriate to make details of their heritage assessment public. The Society has also been informed by representatives of Defence a Heritage Management Plan has not been developed for the Bulimba Barracks Precinct which includes the Project site. The Defence “Statement of Evidence” to the Committee states: *“The IER concluded that heritage risks associated with the project are minor and manageable through the development of a site specific Construction Environmental Management Plan.”*
21. In the “Guidance on Preparing Construction Environmental Management Plans”⁶ it states Defence has identified a list of commonly overlooked issues in CEMPs relating to the environmental aspects and Environmental Heritage is identified as one of these issues.
22. While we have not seen the Initial Environmental Review (IER), the Society has concerns because no Heritage Management Plan has been developed as required by the DEQMS and therefore any Construction Environmental Management Plan (CEMP) may not address heritage concerns.
23. The Society has reviewed a report prepared by Jacobs in November 2014. This report refers to a Department of Defence Site Precinct contained within the Bulimba District Neighbourhood Plan. The Society notes the site for the Project is contained within this precinct. In its section in Heritage significance this report also identifies the site as being:

“An important remnant of the United States Military presence in Brisbane during the Second World War” and that it “plays a very important role in Brisbane’s military history”.

⁵ <http://www.defence.gov.au/estatemangement/governance/Policy/Environment/Heritage/Docs/HeritageToolkit.pdf>

⁶ <http://www.defence.gov.au/estatemangement/governance/Policy/Environment/EIA/Guidance/CEMPGuidance.doc>

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24. It highlights this importance in areas such as it being:
- *“A surviving Second World War industrial base established by the United States Military in 1943 and reflecting the unrepresented military activity along the Brisbane River”;*
 - *“A rare example of a Second World War barge building facility built for the United States Military built at a time of intensive military activity in Brisbane by the United States Military”: and*
 - *“Important in demonstrating a high degree of creative or technological achievement at a particular period as an important surviving United States Military industrial facility for the intensive manufacture of barges.”*
25. In the Site inspection of the report it identifies that “more research and investigation would be required” in relation to the Chinese labour camp and subsurface historical archaeological remains on land and in the river bed. The Society research found “Approximately 800 Chinese lived in barracks at the Chinese Camp, Camp "A", near Apollo Road at Bulimba and were involved in building landing barges for the Americans.”⁷ **The Society believes the Bulimba Barracks Precinct was home to the largest group of Chinese workers in Australia.**
26. The report goes on to detail some of the specific aspects of the barge building activities including the significance involvement of Chinese labourers involved in this activity. These labourers were housed in an onsite camp at the western end of the precinct and worked across the Precinct including at the dry dock at the eastern end of the precinct. This link between Australia and China during WW2 is an important cultural and heritage aspect of the Precinct.
27. In the “Statement of Evidence” to the Committee it was identified in relation to “Native Title/Indigenous Land Use Agreements that “. The proposed works at Moreton have no known Native Title or Indigenous Land Use Agreement issues.” The Society believes the Project needs to be assessed in relation to the Native Title Act 1993 (Cth) and the Society notes that “Project Element 8 – Boat Ramp” appears to be tidal works and the proposed work is to be carried out on land in which native title rights and interests may exist.
28. While the WW2 history of the site is significant from a Commonwealth prospective, the history of the site preceding this period should also be understood as a location where the first interaction between indigenous people occurred prior to John Oxley where Phampllett, Finnigan and Parsons had begun living with local tribes. The site was used for farming, housing and industrial activities including a candle works.
29. While some history is identified much has been omitted from the Jacobs report and the Society believes that if this report has provided the basis of the Project “Construction Environmental Management Plan” than Defence has not effectively completed activities in accordance with the EPBC Act and its own requirements.

⁷ <http://www.ozatwar.com/ozatwar/chinesebulimba.htm>

7. Comments for Consideration by the Committee

30. The Society supports an active military presence will be maintained in the Bulimba Barracks Precinct and would like Defence to consider how that active presence can be integrated with a recognition of past activities on the site that played an important part in the defence of Australia and World War Two.
31. The Society recognises the work undertaken by Defence to date in relation to heritage at the Precinct but believes additional works including the preparation of a Heritage Management Plan are required to identify specific cultural and heritage aspects and determine how cultural and heritage values should be protected. The Society notes the Jacobs report identifies additional works are required.
32. While Defence is in the process of preparing plans in relation Construction Environmental Management, the Society believes these plans are passive and should not only identify how to protect the sites cultural and heritage values insitu but should also promote the integrity of the Precinct through recognition and connectivity.
33. While understanding *Moreton* is a Commonwealth site it is noted some work is planned on public land (Taylor Street Park road reserve) and the Brisbane River (boat ramp). Community concerns have been raised through a Brisbane City Council local master planning process in regard to public land and connection links. Neither the Commonwealth Government nor Defence were involved in any public community consultation relevant to the process.
34. Historically the local community values links to public land and the Brisbane River. Local planning requirements and conditions in relation to connectivity have been required on current and future development sites, as evidenced by planning requirement imposed on adjacent developments. The Society acknowledges Defence plans show a future walkway along the southern boundary of the *Moreton* site however community concerns about public ownership and usage have not been publicly addressed by Defence.
35. Although the Precinct is recognised for its local heritage significance the Society believes it is an oversight that its importance is not recognised by the Commonwealth and, to date, Defence has not completed a Heritage Management Assessment. The Society requests the significant cultural and heritage values of the Bulimba Barracks Precinct, which includes the project site, are assessed against all relevant criteria demonstrating cultural and heritage significance to the Commonwealth and Queensland. In December 2016 Society members made submissions to Defence in relation to these matters.