

BULIMBA DISTRICT HISTORICAL SOCIETY INC
3.3 SUPPLEMENTARY TO SUBMISSION 3
HMAS *MORETON* UNIT RELOCATION PROJECT,
HMAS *MORETON*, BULIMBA, QUEENSLAND.

27 July 2017

Mr Scott Buchholz MP

Chair

Parliamentary Standing Committee on Public Works

Parliament House

CANBERRA ACT 2600

Dear Mr Buchholz

HMAS *MORETON* UNIT RELOCATION PROJECT, HMAS *MORETON*, BULIMBA QUEENSLAND

1. The Bulimba District Historical Society Inc (the Society) provides this letter and annex A July 2017 as a late supplementary submission to the Parliamentary Standing Committee on Public Works (PWC) in relation to the HMAS Moreton Unit Relocation Project, Bulimba, Queensland (the Project) and in response to Defence Supplementary submissions 1.3, 1.4, 1.5 and attachment 1.¹
2. The Society, as a volunteer group, has dedicated many hours of research relevant to the Project and we apologise for the delay in responding to the PWC. Defence submissions 1.5 and attachment 1 only became available on the PWC website late yesterday, Wednesday, 26 July 2017. The Society acknowledges the Heritage Impact Assessment (HIA) and notes recommendation relevant to a Heritage Management Plan (HMP).
3. The Society acknowledges previous Defence responses to commitments to a HMP and a detailed heritage assessment yet to be completed for HMAS Moreton.
4. It is the view of the Society that Defence, to date, has not managed environmental heritage risks and Commonwealth Heritage (CH) values on the HMAS Moreton site (an historic heritage place in Commonwealth ownership being used for Defence purposes) in a manner consistent with Commonwealth Heritage management principles outlined in Commonwealth legislation and Defence requirements.
5. Neither a detailed heritage assessment nor a Heritage Management Plan (HMP) has been completed for HMAS *Moreton* so the Project team cannot be totally aware of potential issues to be managed and is therefore underprepared to deal with environmental (heritage) risks and other risks associated to projected costs forecasts.

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

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6. The Society requests the PWC makes a recommendation for the detailed heritage assessment and a Heritage Management Plan (HMP) for HMAS Moreton to be completed prior to any approval for proposed works so that all risks are appropriately addressed.
7. Defence's Initial Environmental Review prepared in 2015 does not appear to address Commonwealth Heritage values and all historically significant features, therefore a Construction Environmental Management Plan cannot properly address all Environmental Heritage issues.
8. Defence's "Guidance on Preparing Construction Environmental Management Plans" (CEMP)² - identifies a list of commonly overlooked issues in CEMPs relating to environmental aspects and it is noted Environmental Heritage is identified as one of the issues. The Society requests Defence's commitment to a HMP be completed.
9. Defence response June 2017 ANNEX D TO DGCFI/OUT/2017/AF29105796 appears to provide contradictory statements in relation to heritage research and assessment:
 - (i) "Defence considers that it has undertaken appropriate research for the site to determine the cultural and heritage significance of HMAS *Moreton*."
 - (ii) "Defence will engage an appropriately qualified heritage consultant to complete a detailed Heritage Assessment of HMAS *Moreton*, against the Commonwealth, Queensland State and Local Government heritage criteria."³
10. Defence have provided a written response to the Society in regard to the Project regarding Defence's commitment to compile a Heritage Management Plan (HMP) for the HMAS Moreton site and the most appropriate person within Defence to act as the single point of contact for the Environmental Assessment and any recommendations that result from the assessment (a HMP being a potential one for HMAS Moreton) being the Director, Estate Disposals Program.
11. The Society notes options and decisions about the HMAS *Moreton* Unit Relocation Project are dependent on and directly related to both the Project site (HMAS Moreton naval base) and Disposal site (Bulimba Barracks).⁴
12. The Society requests the PWC review all matters and make recommendations to ensure community concerns are addressed in full prior to any approvals for the Project.
13. The Society is committed to trying to ensure that Defence:
 - (i) meets all Commonwealth heritage obligations relevant to a historic heritage place currently in Commonwealth ownership and being used for defence purposes;

² <http://www.defence.gov.au/estatemangement/governance/Policy/Environment/EIA/Guidance/CEMPGuidance.doc>

³ http://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Public_Works/HMASMoreton/Submissions

⁴ http://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Public_Works/HMASMoreton/Submissions

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- (ii) engages an appropriately qualified heritage consultant to complete a detailed Heritage Assessment of HMAS *Moreton* which addresses the full range of cultural and heritage values on a historic heritage place with Commonwealth Heritage (CH) values;
- (iii) addresses environmental heritage risks and impacts on all cultural and heritage values of a historic heritage place including indigenous and non-indigenous; non-military and military heritage and historically significant features through a Heritage Management Plan (HMP); and
- (iv) considers historical links, connections, future walkways and safe pedestrian access to parkland which are significantly important to the local community and relevant to emerging communities.

14. The Society provides the following details to clarify its understanding and research of Commonwealth owned land currently being used for Defence purposes for HMAS *Moreton* site:

- HMAS *Moreton* is currently using the entire site, formerly known as Bulimba Barracks/Apollo Barge Depot/Bulimba Army Camp B, which was previously located on one lot, Lot 24 RP 813319 (area 23.15 hectares) referenced as 167 Apollo Road, Bulimba. The site is identified in Queensland as a World War II historic place.
- The one lot, Lot 24 RP 813319, was reconfigured by Defence into two separate lots.
 - (i) Project site – HMAS Moreton Unit Relocation Project - land identified by Defence as being retained and developed 100 Taylor Street, Bulimba Lot 2 on SP276395 Title Area: 23710 m2. The project site also includes an area on the Brisbane River - Queensland Government (State) Wet Lease for a marine facility – Term Lease 132A Taylor Street, Bulimba Lot 890 on SL12406 Title Area 2600 m2.
 - On 14 May 2016 the Royal Australian Navy (RAN) renamed and commissioned this parcel of defence land for retention as HMAS *Moreton* naval base which is responsible for coordination and administration of all RAN activities in Queensland south of Rockhampton to the NSW border.
 - On 30 March 2017 the Parliament of Australia, Parliamentary Standing Committee on Public Works (PWC) launched an inquiry into Defence’s proposed HMAS *Moreton* Unit Relocation Project (Project), a \$15.6M (ex GST) development proposal.
 - Proposed development works are planned on both Defence land and Public land.
 - External works are proposed on public park land under the control of Brisbane City Council (Public Land and Council Assets Local Law 2014), described as Taylor Street Park (road reserve), Taylor Street, Bulimba.
 - Access to RAN naval base HMAS Moreton is via Apollo Road through the disposal site.
 - Current accommodation and other facilities located on the disposal site are still being used by HMAS Moreton naval base for defence purposes.
 - (ii) Disposal site – land identified by Defence as surplus land for disposal - Bulimba Barracks - 25-39 Apollo Road, Bulimba, Queensland, 4171 on Lot 1 SP276395 Title Area: 207300 m2. Also shown on property details search as 167 Apollo Road, Bulimba.

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15. The Bulimba Barracks Precinct is a term referenced in the Brisbane City Council, City Plan 2014 and incorporates both the project site and disposal site.
16. The PWC has been made aware of concerns about public consultation undertaken by Defence. For example, letterbox drops do not mean contact has been made with land owners. The industrial site at 94 Taylor Street, Bulimba, which adjoins the HMAS Moreton Project site on the southern boundary, is a business operation. The property owner was contacted by a member of the Society following the third round of public consultation and he was not aware of either the HMAS Moreton Project or any proposed works. A business representative of the business at 94 Taylor Street advised Society representatives the business lease the property from the property owner and they have no letterbox. The Society passed this information onto Defence.
17. The Society notes the PWC Procedure Manual⁵ Committee responsibilities and processes including 1.21, 1.23 and 1.24 and this submission aims to address the Committee's terms of reference in subsection 17(3) and 17(4) of the *Public Works Committee Act 1969*.⁶

Yours sincerely

Brenda Nolan, Member and Point of Contact

Bulimba District Historical Society Inc

⁵ http://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Public_Works

⁶ <https://www.legislation.gov.au/Details/C2012C00761>

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Bulimba District Historical Society Inc (BDHS) Submission, dated 26 April 2017.	ANNEX D TO DGCFI/OUT/2017/AF29105796	ANNEX A JULY 2017
<p>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:</p> <ul style="list-style-type: none"> • the Environment Protection and Biodiversity Conservation Act 1999; • Native Title Act 1993 (Cth); and • Defence Estate Quality Management System 	<p>In accordance with the Brisbane City Council's proposed Masterplan, a Heritage Management Plan for the portion of the site to be disposed will be the obligation of the purchaser, subject to the proposed development of the land.</p>	<p>Defence has not provided a response for the portion of the site to be retained and developed, being the HMAS Moreton Unit Relocation Project site (Project site).</p> <p>HMAS Moreton site is Commonwealth owned land being used for Defence purposes and it is not bound by local government planning provisions such as Brisbane City Council's proposed Masterplan.</p> <p>A detailed heritage assessment has not been completed for HMAS <i>Moreton</i> so it appears the Project team cannot be totally aware of all potential heritage issues and is therefore underprepared to deal with environmental (heritage) risks.</p> <p>Defence have provided a written response to the Society in regard to the Project regarding Defence's commitment to compile a Heritage Management Plan (HMP) for the HMAS Moreton site and the most appropriate person within Defence to act as the single point of contact for the Environmental Assessment and any recommendations that result from the assessment (a HMP being a potential one for HMAS Moreton) being the Director, Estate Disposals Program.</p>

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		<p>BDHS understand Defence have only recently completed a Heritage Impact Assessment (HIA) of the Project site following requests for heritage assessment and site visit from a heritage consultant on 30 June 2017. BDHS has requested a Heritage Management Plan be completed on the HMAS Moreton site.</p> <p>Defence have not completed a detailed Heritage Assessment on the Project site. <i>Defence Environmental Management System (EMS)</i> details heritage management; a risk-based framework and reference to a specific site based Heritage Management Plan (HMP). BDHS believes a heritage assessment of all cultural and heritage values triggers of the Project site will trigger a risk-based</p> <p>Defence Estate Heritage Strategy published in 2015 ¹ references: “4.4 Outline of current and expected development, works, disposal or other proposals that may affect Commonwealth Heritage values.” And Sections 1.1; 1.3; 3.2, 3.2.1 and 3.2.2: 1.1 The Defence Estate Heritage Strategy states: “The EPBC Act requires all Commonwealth agencies to prepare a Heritage Strategy. Schedule 7C, Regulation 10.03E of the <i>Environment Protection and Biodiversity Conservation Regulations 2000</i> (EPBC Regulations) sets out the matters that a strategy must address,</p>

¹ <http://www.defence.gov.au/estatemangement/governance/Policy/Environment/Heritage/Docs/DefenceHeritageStrategy.pdf>

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		<p>including the identification, assessment and management of CH values.”</p> <p>1.3 <i>“The Defence Environmental Management System: Best practice heritage management is facilitated through a risk-based framework under the Defence Environmental Management System (EMS).” “Under the EMS, specific site-based HMPs, and other policies developed in accordance with the Defence Heritage Strategy, guide the management of heritage places on the estate.”</i></p> <p>3.2 <i>“Time-frames for completion of identification and assessments, the register and the report to the Minister”</i></p> <p>3.2.1 <i>“Priority assessments are made of places that may be subject to re-development or otherwise where heritage values may be under threat.”</i></p> <p>3.2.2 <i>“Defence has developed a Heritage Register of its properties currently included in the Commonwealth Heritage List. Unlisted places on the Defence estate that are known or likely to have CH values are also included on the Defence Heritage Register.”</i></p> <p>The HMAS Unit Relocation Project is a re-development of a historic heritage place with Commonwealth Heritage (CH) values and proposed works are planned both on and in the vicinity of historically significant features, which include an existing boat ramp, river wall and timber beam and post warehouse.</p>

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		<p>With regard to heritage considerations of the cultural and historical significance of the project site it appears Commonwealth Heritage (CH) values could be under threat because all cultural and heritage values and historically significant features have not been assessed and identified correctly and the project site has not been included on the Defence Heritage Register as an unlisted place on the Defence estate that is known to have CH values.</p> <p>Defence has Commonwealth heritage obligations requiring compliance relevant to the HMAS Moreton site for the portion of the site to be disposed (disposal site) and the portion to be retained and developed (project site).</p> <p>Defence heritage investigations should be in accordance with the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act); <i>Environment Protection and Biodiversity Conservation Regulations 2000</i> (EPBC Regulations); the Defence Estate Heritage Strategy published in 2015 and other Defence requirements, including Defence Estate Quality Management System (DEQMS) which states "The first step in protecting heritage is identifying it!"²</p>

² <http://www.defence.gov.au/estatemangement/governance/Policy/Environment/Heritage/Legislation.asp>

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		<p>Defence response references Heritage Assessment of HMAS <i>Moreton</i> which will be prepared in accordance with the Commonwealth, Queensland State and Local Government heritage criteria.</p> <p>A Heritage Assessment of the Project site should result in the need:</p> <ul style="list-style-type: none"> (i) the preparation of a Heritage Management Plan (HMP); (ii) heritage issues to be managed in accordance with a HMP for the HMAS Moreton project; and (iii) a listing of the project site on the Defence Heritage Register as an unlisted place on the Defence estate that is known to have CH values. (iv) Consideration for referral to Minister (Environment and Energy) responsible for the administration of the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) for consideration to be entered in the Commonwealth Heritage List as a historic heritage place with Commonwealth Heritage Values and is Commonwealth owned land being used for Defence purposes. <p>Defence heritage obligations to the community should ensure the detailed heritage assessment is completed and assessed as part of the HMAS Moreton Unit Relocation Project and any heritage assessment is made available to the public as part of community consultation. Furthermore Environmental heritage risks for the</p>

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		<p>Project site should be managed by a Heritage Management Plan (HMP).</p> <p>Defence evidence includes the following information: "Description of proposal boat ramp details"; "enhancing the boat ramp"; "a replacement boat ramp"; "extensions to the boat ramp" and "Project Element 8 – Boat Ramp" Point 51. "The new boat ramp allows for entry to the Brisbane River for small water craft to conduct training and operations. The boat ramp will include pavement, bollards, walls and road access suitable for typical small water craft requirements. Adjacent to the area will be a hardstand for loading and unloading equipment associated with small water craft operations. The boat ramp replaces the existing boat ramp, outside the Moreton boundary, that will be lost with disposal of the balance of the site." and Point 52. "Attachment 8 includes a plan showing the Boat ramp layout." ³</p> <p>Please note Attachment 8 shows the location of the warehouse in the vicinity of the boat ramp and new hardstand area. Also the title areas clearly show the indented boat ramp area discussed as shown on historical maps and Defence site plan 2012.</p>

³ http://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Public_Works/HMASMoreton/Submissions

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		<p>With regard to Defence's Jacobs Group (Australia) Pty Limited (Jacobs) Jacobs Report Bulimba Barracks Photographic Recording DEPARTMENT OF DEFENCE Preliminary Assessment Report Final DEHP-ID-050 dated 27 November 2014, BDHS understand the relevance of the report.</p> <p>Defence should note the 2014 report shows historical references to both the disposal site and the Project site (currently HMAS Moreton which was formerly Bulimba Barracks) and provides details and site plan about the warehouses and river wall and the existing boat ramp on the project site.</p> <p>BDHS have raised issues of concern that Defence should reference site plan "0126 - Bulimba Barracks - Brisbane - Site Plan DS -SQ Issued by Marie Johnston Correct as at 18 April 2012 Amended November 2014 (Jacobs) Figure 4.1: Bulimba Barracks site plan showing 1940s buildings and locations of plaques/memorials and other features (modified from Department of Defence 2012 plan)".</p> <p>Defence should reference the original site plan 0126 as at 18 April 2012 which identifies buildings on the Project site; references the river wall along the entire site and existing boat ramp on the Project site.</p>

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		<p>The boat ramp and marine facilities (wharf, jetty and pier) are existing separate areas on the Project site.</p> <p>BDHS do not understand why in 2017 there is any uncertainty about the warehouse, riverwall and boat ramp on the project site.</p> <p>Defence site plan 0126 prepared in April 2012 is in line with and why Brisbane City Council information provided in 2015 was referenced by Defence to the PWC. In 2012 Defence had a site plan showing the project site and 1946 aerial photos clearly identify the project site and historical significance.</p> <p>On 30 March 2012, The Australian Defence Force Posture Review detailed “6.15 This Review therefore considers that Brisbane is the most promising location for a new fleet base on the east coast” and references “The small Navy establishment at Bulimba Barracks could be a useful location for supporting the development of a supplementary fleet base in Brisbane and the associated adjustments in Navy’s organisational structure and postings.”⁴</p> <p>2016/36 Defence Estate Strategy references Strategic Action 1.1.7 Defence will ensure “its development is sensitive to surrounding land uses and the community” and Strategic Action 4.1.4 -</p>

⁴ <http://www.defence.gov.au/publications/reviews/adfposture/Docs/Report.pdf>

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		<p>Defence will “maintain positive and proactive relationships with the community, government, environmental regulators and other key stakeholders”; an “ensure all Defence personnel understand their obligations in relation to managing the Defence estate on behalf of the Australian community”.⁵</p> <p>Defence references the portion of the site to be disposed. The disposal site is referenced as Bulimba Barracks. Defence should ensure all due diligence investigations are completed to achieve compliance with Commonwealth legislation and Defence requirements. Commonwealth Heritage (CH) values need to be addressed. Defence Estate Heritage Strategy published in 2015 sets out obligations relevant to disposal of land in the Defence estate.</p> <p>BDHS understands once the surplus Defence land (disposal site) is sold out of Commonwealth ownership, the local government, Brisbane City Council, planning provisions – Brisbane City Plan 2014, Bulimba District Neighbourhood Plan, Bulimba Barracks Masterplan will then apply. However, it should be noted the Masterplan is only a guide to any purchaser.</p>
	Any future use of the Bulimba Barracks disposal site is a matter for the future owner and subject	Defence response 1 st and 2 nd paragraphs are not relevant to the HMAS Moreton Unit Relocation Project site.

⁵ <http://www.defence.gov.au/EstateManagement/Governance/Docs/DefenceEstateStrategy2016-36.pdf>

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	<p>to the Brisbane City Council's Proposed Masterplan.</p> <p>In accordance with the Brisbane City Council's proposed Masterplan, a Heritage Management Plan (which should include heritage investigations and consultations) for the portion of the site to be disposed will be the obligation of the purchaser, subject to the proposed development of the land.</p> <p>A detailed Heritage Assessment of HMAS <i>Moreton</i>, will be prepared in accordance with the Commonwealth, Queensland State and Local Government heritage criteria.</p> <p>Engagement with the Chinese community should occur as part of the purchaser's Heritage Management plan, noting that the Chinese workers camp is</p>	<p>See responses above - Commonwealth owned land currently being used for Defence purposes is not bound by local government planning provisions.</p> <p>Defence has Commonwealth heritage obligations which need to comply with Commonwealth Heritage (CH) values, Commonwealth legislation and Defence requirements.</p> <p>See previous points in rows above relevant to both the project site and disposal site which address the heritage assessment and management in accordance with a HMP and HIA.</p> <p>Defence should consider the community relationship with the heritage of site which dates back prior to US military takeover of the area. Prior to military takeover and occupation during World War 2 the project site and the precinct amongst other things was the site of indigenous habitation; farming allotments acquired between 1849 and 1880; industrial uses from 1880 including Apollo Soap and Candle Works; and had waterfront works undertaken as employment generation projects during the depression.</p> <p>During the Second World War, the project site and the military precinct, were sites of military significance as a logistics and operational location and also industrial activity including construction of barges undertaken in large part by Chinese</p>

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	<p>located off Hood Street in Bulimba Barracks near Apollo Road, which is not located in the vicinity of the proposed HMAS <i>Moreton</i> site.</p>	<p>nationals at the directing of the United States military. After the Second World War a number of military units have been located on the project site and this precinct.</p> <p>Heritage assessments should consider all historically significant features, non-military and military history of the project site including the important heritage values of the Royal Australian Electrical and Mechanical Engineers (RAEME); Citizen Military Forces (CMF) and Army Reserve (ARes); United States Army; the reported 750 to 2000 Chinese workers, the Chinese Seamen's Union and remarkable resilience of Chinese who came to this country, either voluntarily or as refugees. The Chinese camp had an entrance from Hood Street and living accommodation along the lower side on Baldwin Street. Defence investigations relevant to the project site have given no regard to the important work the Chinese workers undertook on work sites in military camps along the Brisbane River.</p> <p>2016/36 Defence Estate Strategy foreward states: "Defence is an active participant in the life of the Australian community. The Defence estate is a resource granted to Defence by the community in order to help build and sustain Defence capability. How Defence exercises stewardship over the estate is of vital interest to all Australians because of the potential for activities that Defence might undertake to enhance or degrade community well-being. The ability of Defence to deliver and sustain capability</p>

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		<p>for government is built on the foundation of community trust and support for Defence activities. In managing the estate, Defence will work actively to build trust and recognise our responsibility as an active participant in community life. This includes recognising the community interest in a safe and sustainable environment.”⁶</p> <p>Defence response June 2017 states: “A detailed Heritage Assessment of HMAS <i>Moreton</i>, will be prepared in accordance with the Commonwealth, Queensland State and Local Government heritage criteria.”</p> <p>Defence heritage obligations should be undertaken for each site as the project site is remaining in Commonwealth ownership and the disposal site is surplus land to be sold.</p>
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.		See response on Native Title issues.
Ensure engagement with the Chinese community to ensure special consideration is given to the cultural and heritage connection		Project site - HMAS Moreton Unit Relocation Project - Engagement with the Chinese community:

⁶ <http://www.defence.gov.au/EstateManagement/Governance/Docs/DefenceEstateStrategy2016-36.pdf>

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<p>of this site to the Chinese involvement in assisting the Defence of Australia during World War Two.</p>		<p>Defence News and Media on 19 July 2017 reports on Defence Hosts Senior Chinese Military Delegation: “It is important for Australia and China to maintain a positive defence relationship,” Air Chief Marshal Binskin said.⁷</p> <p>Defence response references “Chinese workers camp”.⁸ The camp had an entrance from Hood Street and living accommodation was along the lower side on Baldwin Street.</p> <p>BDHS are not just talking about heritage values where the Chinese lived. Defence should give regard to the Chinese history and cultural heritage and important work on the barge assembly lines and industrial work along the Brisbane River undertaken by Chinese workers which is reported to have involved from 750 to 2000 staff. The Chinese staff worked at two sites, “known during construction as Camps A and B”.⁹</p> <p>The Queensland Journal of Labour History No.9 September 2009 states: “In “The Chinese Presence in Queensland”, Connie Healy writes of the remarkable resilience of Chinese who came to this country, either voluntarily or as refugees, and how they overcame racial vilification and non-acceptance by the predominantly Anglo-Saxon population.”¹⁰</p>

⁷ <https://news.defence.gov.au/media/media-releases/defence-hosts-senior-chinese-military-delegation>

⁸ <http://www.ozatwar.com/locations/bulimbabargedepot.htm>

⁹ <http://www.ww2places.qld.gov.au/places/?id=329>

¹⁰ <http://www.labourhistory.org.au/wp-content/uploads/2012/10/QJLH-No-09-Sept-2009-final.pdf>

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		<p>The names of the Chinese men at Bulimba were recorded in an index book which is now in the National Archives collection.¹¹ If they had been serving on ships prior to their placement the details were listed. Some of the Chinese were Australian residents. One thousand and thirty-five names are listed in this one volume. The US Military coordinated an American project building barges in Bulimba. The Bulimba Small Ship Division Project was staffed by 2000 Chinese seamen many of whom were stranded in Australia by the war. They formed their own seamen's union, (Chinese Seamen's Union) and members raised funds for wartime refugees; took care of men who fell ill and buried those who died from accidents.¹²</p> <p>See rows above for further response.</p>
<p>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.</p>	<p>In accordance with the Brisbane City Council's proposed Masterplan, a Heritage Management Plan (which would include cultural and heritage assessments) for the portion of the site to be disposed will be the obligation of the purchaser,</p>	<p>Defence has not provided a response for the portion of the site to be retained and developed, being the HMAS Moreton Unit Relocation Project site.</p> <p>Commonwealth owned land currently being used for Defence purposes is not bound by local government planning provisions. See responses in above rows.</p>

¹¹ <http://www.naa.gov.au/collection/snapshots/chinese-australians/index.aspx>

¹² http://www.multiculturalaustralia.edu.au/doc/mok_liu.pdf

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	subject to the proposed development of the land.	<p>Heritage considerations: Defence should provide a response why HMAS Moreton project site, as a historic heritage place with Commonwealth Heritage (CH) values and remaining in Commonwealth ownership, has not be referred to the Minister (Environment and Energy) responsible for the administration of the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) for consideration to be entered in the Commonwealth Heritage List.</p> <p>BDHS notes the Committee’s terms of reference subsection 17(4) of the <i>Public Works Committee Act 1969</i> states: “In considering and reporting on a public work proposed to be carried out by an authority of the Commonwealth, the Committee shall have regard to the functions, powers and duties of the authority and to the powers conferred on a Minister in relation to the activities of the authority concerned.”¹³</p> <p>BDHS notes the PWC Procedure Manual Committee responsibilities and processes states: “1.24 The Act gives the Committee wide powers to recommend any alterations to the proposed work that it sees fit. This means that the Committee can inquire into any matter it sees relevant in order to make such</p>

¹³ <https://www.legislation.gov.au/Details/C2012C00761>

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		recommendations.” ¹⁴
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.	<p>A key requirement for Navy's continued presence at HMAS <i>Moreton</i> is to maintain secure river front access which includes access to the existing pontoon and boat ramp. Subsequently pedestrian and bicycle access through the retained HMAS <i>Moreton</i> site will not be possible.</p> <p>The provision of an easement would result in a change to the current security risks posed to Defence, the immediate neighbouring properties and any member of the public using the easement. Additionally, the provision of an easement would require both initial and ongoing maintenance costs. Defence</p>	<p>BDHS note the key requirement for the Navy's presence at HMAS Moreton is to maintain secure river front access which includes access to the existing pontoon and boat ramp which is located on the northern boundary of the project site.</p> <p>BDHS are requesting a recommendation for provision to the community for access to a proposed exclusion zone future walkway identified by Defence along the southern boundary of the project site.</p> <p>Defence as the proponent entity for the project, identified proposed development plan Attachment 7 – Site Works and Infrastructure showing an Exclusion Zone – Future Walkway along the southern boundary of the project site.</p> <p>Defence does not appear to have identified any security risk in the planning stage for either HMAS Moreton or immediate neighbouring properties because Defence plans show the future walkway.</p>

¹⁴ http://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Public_Works

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	<p>considers alternative linkages between the Bulimba Barracks Precinct and 153 Taylor Street could be made to achieve the same intent whilst mitigating the risks.</p> <p>Any cultural and heritage considerations of the Bulimba Precinct and neighbouring properties along the river including to the east, Taylor Street Park and 153 Taylor Street, Bulimba and to the west, Byron Street Precinct and Apollo Road ferry are subject to the Brisbane City Council's proposed Master Plan and matters for the current/future owners.</p>	<p>Immediate neighbouring properties have not identified any security risk in consultation reports. Historically there have been no security risks with public areas such as public paths adjoining defence sites or private properties in Bulimba.</p> <p>Defence should note throughout Brisbane private properties have direct access links to public walkways and any security risks are managed and there is a provision of adequate screening to address privacy issues.</p> <p>In Bulimba private property owners in the Byron Street Precinct had to provide a future walkway as community purpose of Park to the Brisbane City Council. Future private property owners will have a future public walkway adjoining their property. Current private property owners in Addison Avenue, Bulimba and Portside Place, Bulimba have a public walkway adjoining their properties.</p> <p>Defence should consider historical links, connections, future walkways and safe pedestrian access to parkland which are significantly important to the local community and relevant to emerging communities.</p> <p>BDHS is not requesting pedestrian and bicycle access through the retained HMAS Moreton site along the river. BDHS is requesting heritage considerations of historical community links being</p>

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		<p>walkways and paths which are recorded as being used by indigenous and non-indigenous people including farmers and military persons.</p> <p>BDHS makes a recommendation that the PWC request Defence:</p> <ol style="list-style-type: none"> 1. Ensure the exclusion zone, future walkway identified by Defence on the southern boundary be 10metres wide for the entire length (not reduced to 3metres at Taylor Street) to allow appropriate screening and width for public use. 2. Transfer to Brisbane City Council in fee simple in trust for the exclusion zone identified as a future walkway as community purpose of Park. Defence would incur any future costs. 3. Ensure safe public access to the Brisbane River via Taylor Street and Taylor Street Park. <p>The HMAS Moreton development proposal and public inquiry provides an opportunity to ensure the Federal Government, Defence, Queensland Government and Brisbane City Council negotiate positive outcomes for the community and future emerging communities in regard to addressing heritage values; future walkways and safe pedestrian connections to the Brisbane River.</p> <p>The existing public land, where external works are proposed, is identified by the Brisbane City Council as "Land for Park</p>

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		<p>Infrastructure" and "<i>Existing Taylor Street Park - 3,500m²</i>".</p> <p>Defence plans show the area only as a dead end and road closed and propose a cul-de-sac and driveway access. The plan does not appear to cater for a footpath area continuing along the eastern boundary of Taylor Street, connecting to Taylor Street Park and the Brisbane River as river viewing point. There are no details about public access to the Brisbane River. In fact it appears there will be no safe pedestrian access at the area where Defence propose external works.</p> <p>Defence should note Commonwealth Legislation: Australian Government Department of Infrastructure and Regional Development website¹⁵ which provides detail on Active Transport - Walking and Cycling. Whilst the information may not be applicable to Defence land it is very relevant to external proposed work. Defence should ensure Commonwealth legislation is addressed with the Brisbane City Council during negotiations about Defence access from Taylor Street and Taylor Street Park.</p> <p>(a) "The Australian Government supports measures to increase all aspects of active transport in Australian communities, and is a member of the Australian Bicycle Council. The design, project deployment and funding of cycling and pedestrian facilities is primarily a matter for state, territory and local governments."</p>

¹⁵ https://infrastructure.gov.au/infrastructure/pab/active_transport/

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		<p>(b) "Infrastructure for walking and cycling"</p> <ul style="list-style-type: none"> • "The Australian Government supports safe road environments for all road users—pedestrians (which include most wheeled mobility and recreation devices such as skateboards, roller skates and roller blades) and cyclists." • "While the designing, project deployment and funding of cycling and pedestrian infrastructure is primarily a matter for state, territory and local governments, the Australian Government's investment in infrastructure includes, in relevant projects, the building of new cycling and pedestrian infrastructure as part of the overall project (where identified by project proponents)." <p>Defence should consider this is not a matter for future owners of land. Defence identified a future walkway and Commonwealth owned land is being retained for Defence purposes.</p> <p>It appears Sewerage infrastructure is in the vicinity of the exclusion zone.</p>
<p>To date, it appears Defence has not:</p> <p>a. undertaken appropriate research to determine the cultural and heritage significance of the Precinct and Defence</p>	<p>Defence considers that it has undertaken appropriate research for the site to determine the cultural and heritage significance of HMAS <i>Moreton</i>.</p>	<p>The 2015 IER does not appear to meet compliance with Commonwealth heritage obligations detailed in the 2015 Defence Estate Heritage Strategy for a historic heritage place and Defence Estate Quality Management System (DEQMS) which states "The first step in protecting heritage is identifying it!"¹⁶.</p>

¹⁶ <http://www.defence.gov.au/estatemangement/governance/Policy/Environment/Heritage/Legislation.asp>

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<p>facilities contained within this Precinct;</p> <p>b. conformed to the requirements identified by Defence;</p> <p>c. given enough consideration to recognition of culture and heritage and how this can be preserved within the Bulimba community; and</p> <p>d. appropriately addressed community concerns raised about links between the Precinct, neighbouring properties, emerging communities and development sites along the river.</p>	<p>Defence commissioned an Initial Environmental Review that assessed the cultural and heritage aspect of the Project works.</p> <p>This review determined that the only cultural and heritage feature present on HMAS <i>Moreton</i> was the warehouse, which is likely to have been built before or during World War II. No alteration of the existing warehouse is proposed as part of the Project works.</p> <p>In addition, the Initial Environmental Review also determined that the Project was unlikely to have significant impacts on matters protected by the EPBC Act.</p>	<p>Defence response appears to provide contradictory statements in relation to heritage research and assessment:</p> <ul style="list-style-type: none"> ○ “Defence considers that it has undertaken appropriate research for the site to determine the cultural and heritage significance of HMAS <i>Moreton</i>.” ○ “Defence will engage an appropriately qualified heritage consultant to complete a detailed Heritage Assessment of HMAS <i>Moreton</i>, against the Commonwealth, Queensland State and Local Government heritage criteria.” <p>A Construction Environmental Management Plan cannot properly address all Environmental Heritage issues if a heritage assessment has not been completed. Defence’s “Guidance on Preparing Construction Environmental Management Plans” (CEMP)¹⁷ - identifies a list of commonly overlooked issues in CEMPs relating to environmental aspects and Environmental Heritage is identified as one of the issues.</p> <p>The 2015 IER does not appear to meet compliance with Commonwealth heritage obligations detailed in the 2015 Defence Estate Heritage Strategy for a historic heritage place and Defence Estate Quality Management System (DEQMS) which states "The first step in protecting heritage is identifying it!"¹⁸ .</p>

¹⁷ <http://www.defence.gov.au/estatemangement/governance/Policy/Environment/EIA/Guidance/CEMPGuidance.doc>

¹⁸ <http://www.defence.gov.au/estatemangement/governance/Policy/Environment/Heritage/Legislation.asp>

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	<p>Defence will engage an appropriately qualified heritage consultant to complete a detailed Heritage Assessment of HMAS <i>Moreton</i>, against the Commonwealth, Queensland State and Local Government heritage criteria.</p> <p>Links between the precinct neighbouring properties, emerging communities and development sites along the river are subject to Brisbane City Council's proposed Masterplan and matters for the current/future owners.</p>	<p>Defence based evidence to the PWC on a Brisbane City Council email September 2015 – “there was no significant heritage value with the stone wall that was on the HMAS <i>Moreton</i> site and there is uncertainty surrounding the historical significance of that warehouse.”¹⁹</p> <p>Defence should review the 1946 aerial photo (and following years) and Department of Army plans 1957 clearly show the significant historical features including warehouse, river wall and boat ramp.</p> <p>Defence should note a heritage assessment would have identified significant heritage features with Commonwealth Heritage values.</p>
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	In relation to the Native Title Act 1993 (Cth) HMAS <i>Moreton</i> is Freehold land and therefore Native Title is extinguished. Native Title may exist over State owned property, as is the case	Defence evidence June 2017 is advising Native Title “may exist” with the boat ramp area. Defence evidence should be certain on Native Title issues relevant to the proposed works in the vicinity of the boat ramp area which incorporates land governed by the Queensland state government. Defence should confirm to the PWC: if Native Title does exist over the boat ramp area; who is

¹⁹ http://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Public_Works/HMASMoreton/Public_Hearings

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<p>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.</p>	<p>with the boat ramp area.</p> <p>National Native Title Tribunal (NNTT) file No: QCD2015/001 - Applicants Yugara/Yugarapul People and Turrbal People placed a claim over greater area of Brisbane (which includes the Project site).</p> <p>Application NNTT QCD2015/001 determined in March 2015 that Native Title over the boat ramp did not exist. There is no current Application covering/encompassing the Project site.</p> <p>Using the Australian Heritage Commissions' "Ask First" Guide, steps have been made to identify the traditional owners and Applicant group through the Queensland South Native Title Services (QSNTS). As part of the</p>	<p>responsible for notification to the traditional owners; and who are the traditional owners who will be notified.</p> <p>BHDS contacted Queensland South Native Title Services (QSNTS) and was advised notification was required. BHDS referenced native title relevant to requirements of notification relevant to future acts.²⁰</p> <p>BDHS notes Native Title references:</p> <p>March 2017 evidence advised:</p> <ul style="list-style-type: none"> • "The proposed works at Moreton have <u>no known Native Title</u>". <p>June 2017 evidence advised:</p> <ul style="list-style-type: none"> • "Native Title <u>may exist</u> over State owned property, as is the case with the boat ramp area." • "Application NNTT QCD2015/001 determined in March 2015 that <u>Native Title over the boat ramp did not exist.</u>" • "As part of the <u>State Assessment Referral Agency (SARA) process for the development associated with the boat ramp site, QSNTS will be consulted</u>" (Queensland South Native Title Services)

²⁰ <http://www.qsnts.com.au/future-acts/>

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	<p>State Assessment Referral Agency process for the development associated with the boat ramp site, QSNTS will be consulted and a request will be made to meet with relevant Applicant group. As part of the mitigation measures identified by the Initial Environmental Review (attached at annex F), the Construction Environmental Management Plan will identify how to treat cultural heritage sites if discovered during excavation works.</p>	<p>Defence have identified the Yugara/Yugarapul People and Turrbal People and Queensland South Native Title Services (QSNTS).</p> <p>BDHS research of historic maps and information confirm reference to the Yugara/Yugarapul People and Turrbal People.</p> <p>Defence should confirm details of Queensland South Native Title Services (QSNTS) Future Acts: “Under the <i>Native Title Act 1993</i> (Cth) and the <i>Aboriginal Cultural Heritage Act 2003</i> (Qld), a native title claim that has been registered or determined has certain rights including the right for the Applicant or PBC to be notified and consulted on future acts that may affect their native title rights and interests.</p> <p>Most future acts are notified under section 24 of the <i>Native Title Act</i>. QSNTS provides registered claimants and PBCs with assistance in understanding the process for commenting on or objecting to the proposed activities.</p> <p>Activities such as mining, petroleum exploration and compulsory acquisition of land for non-government parties are notified under section 29 of the <i>Native Title Act</i> (NTA). Where a ‘Right to Negotiate’ applies, QSNTS provides a service representing the registered native title Claimants and PBCs in negotiations and, if necessary, arbitration of future acts.”²¹</p>

²¹ <http://www.qsnts.com.au/future-acts/>

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		In reference to mitigation measures identified by the Initial Environmental Review and the Construction Environmental Management Plan please see responses in rows above.
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.	The 'Jacobs report' referred to by the Bulimba District Historical Society Incorporated was commissioned for the disposal of the site and not the HMAS <i>Moreton</i> Project. However, the report was considered as part of developing the HMAS <i>Moreton</i> Project's Initial Environmental Review. The proposed HMAS <i>Moreton</i> 's site history was assessed in the HMAS <i>Moreton</i> Project's Initial Environmental Review and will be further investigated as part of the proposed detailed Heritage Assessment. Mitigation measures will be included in the Construction Environmental Management Plan in order to ensure compliance with appropriate Commonwealth,	<p>If Defence considered the Jacobs Report dated 27 November 2014 as part of developing the HMAS <i>Moreton</i> Project's Initial Environmental Review IER in 2015 in relation to Commonwealth Heritage values there should have been no uncertainty about the historical significance of the site and historically significant features.</p> <p>With regard to Defence's Jacobs Group (Australia) Pty Limited (Jacobs) Jacobs Report Bulimba Barracks Photographic Recording DEPARTMENT OF DEFENCE Preliminary Assessment Report Final DEHP-ID-050 dated 27 November 2014, BDHS understand the relevance of the report.</p> <p>Defence should note the 2014 report shows historical references to both the disposal site and the Project site (currently HMAS Moreton which was formerly Bulimba Barracks) and provides details and site plan about the warehouses and river wall and the existing boat ramp on the project site.</p> <p>BDHS have raised issues of concern that Defence should reference site plan "0126 - Bulimba Barracks - Brisbane - Site Plan DS -SQ Issued by Marie Johnston Correct as at 18 April 2012</p>

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	<p>Queensland State and Local Government heritage acts and policies.</p>	<p>Amended November 2014 (Jacobs) Figure 4.1: Bulimba Barracks site plan showing 1940s buildings and locations of plaques/memorials and other features (modified from Department of Defence 2012 plan)".</p> <p>Defence should reference the original site plan 0126 as at 18 April 2012 which identifies buildings on the Project site; references the river wall along the entire site and existing boat ramp on the Project site.</p> <p>The boat ramp and marine facilities (wharf, jetty and pier) are existing separate areas on the Project site.</p> <p>BDHS do not understand why in 2017 there is any uncertainty about the warehouse, riverwall and boat ramp on the project site.</p> <p>Defence site plan 0126 prepared in April 2012 is in line with and why Brisbane City Council information provided in 2015 was referenced by Defence to the PWC. In 2012 Defence had a site plan showing the project site and 1946 aerial photos clearly identify the project site and historical significance. On 30 March 2012, The Australian Defence Force Posture Review detailed "6.15 This Review therefore considers that Brisbane is the most promising location for a new fleet base on the east coast" and references "The small Navy establishment at Bulimba Barracks could be a useful location for supporting the development of a</p>

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		<p>supplementary fleet base in Brisbane and the associated adjustments in Navy’s organisational structure and postings.”²² Defence should advise why the HMAS Moreton site project site is not on the Defence Register in 2017 if Defence considered the Jacobs Report from 2014.</p> <p>The Jacobs report highlighted and identified:</p> <ul style="list-style-type: none"> ○ “A number of other features were identified during the site inspection that may date to the original 1940s construction of the site, however more research and investigation would be required to confirm this” ○ "more research and investigation would be required from a heritage significance perspective" ○ “1940s buildings are in good condition and contribute to the heritage significance of Bulimba Barracks" ○ "potential for other subsurface remains of early 1940s buildings or previous industrial use of the site" ○ “potential remains of the original concrete wharf directly north of C001, timber jetties, and other marine infrastructure related to the military use of the site within the river bed” <p>In 2017 a detailed heritage assessment has not been completed for HMAS <i>Moreton</i> so the Project team cannot be totally aware of</p>

²² <http://www.defence.gov.au/publications/reviews/adfposture/Docs/Report.pdf>

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		<p>potential issues and is therefore underprepared to deal with environmental (heritage) risks.</p> <p>BDHS is concerned Defence's Initial Environmental Review prepared in 2015 does not appear to address Commonwealth Heritage values and all historically significant features, therefore a Construction Environmental Management Plan cannot properly address all Environmental Heritage issues. Defence's "Guidance on Preparing Construction Environmental Management Plans" (CEMP)²³ - identifies a list of commonly overlooked issues in CEMPs relating to environmental aspects and Environmental Heritage is identified as one of the issues.</p> <p>The 2015 IER does not appear to meet compliance with Commonwealth heritage obligations detailed in the 2015 Defence Estate Heritage Strategy for a historic heritage place and Defence Estate Quality Management System (DEQMS) which states "The first step in protecting heritage is identifying it!"²⁴.</p>
Although the Precinct is recognised for its local heritage significance the Society believes it is an oversight that its importance is not	A review of the heritage aspects of the HMAS <i>Moreton</i> Project site was conducted during the	HMAS Moreton site is Commonwealth owned land being used for Defence purposes and it is not bound by local government

²³ <http://www.defence.gov.au/estatemangement/governance/Policy/Environment/EIA/Guidance/CEMPGuidance.doc>

²⁴ <http://www.defence.gov.au/estatemangement/governance/Policy/Environment/Heritage/Legislation.asp>

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<p>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.</p>	<p>Initial Environmental Review, whereby it was determined that the Project site did not contain significant cultural heritage values. The only building within HMAS <i>Moreton</i> with potential heritage value is the existing warehouse, which may have been built before or during World War II. This warehouse will not be impacted by the Project works.</p> <p>Defence will engage an appropriately qualified heritage consultant to complete a detailed Heritage Assessment of HMAS <i>Moreton</i>, against the Commonwealth, Queensland State and Local Government heritage criteria.</p> <p>In accordance with the Brisbane City Council's proposed Masterplan, a Heritage Management Plan for the portion of the site to be disposed</p>	<p>planning provisions such as Brisbane City Council's proposed Masterplan.</p> <p>A detailed heritage assessment has not been completed for HMAS <i>Moreton</i> so the Project team cannot be totally aware of potential issues and is therefore underprepared to deal with environmental (heritage) risks.</p> <p>See rows above relevant to concerns about heritage obligations and 2015 IER.</p>

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	will be the obligation of the purchaser, subject to the proposed development of the land.	
<p>Bulimba District Historical Society Incorporated Submission, dated 17 May 2017.</p> <p>The Society's April 2017 submission provided details of the EPBC Act requirements related to the Project site and under this Act and Defence protocols a Heritage Assessment needs to be undertaken and any reasonable assessment will lead to a decision needing to be made about Commonwealth Heritage listing for the Precinct and this cannot be ignored and completed as part of any future disposal of an adjacent site.</p>	<p>A detailed Heritage Assessment of HMAS <i>Moreton</i> will be prepared in accordance with the Commonwealth, Queensland State and Local Government heritage criteria. The detailed Heritage assessment will identify any mitigation measures to be implemented by the project.</p>	<p>A detailed heritage assessment has not been completed for HMAS <i>Moreton</i> so the Project team cannot be totally aware of potential issues and is therefore underprepared to deal with environmental (heritage) risks.</p> <p>See rows above relevant to concerns about heritage obligations and 2015 IER.</p>
<p>The Society is not sure of the basis or justification for BRIG. Beutel's statement that "there is no referral required at all under the EPBC Act" and we believe that as a decision-</p>	<p>An Initial Environmental Review was prepared for the Project which involved a review of environmental and heritage</p>	<p>A detailed heritage assessment has not been completed for HMAS <i>Moreton</i> so the Project team cannot be totally aware of potential issues and is therefore underprepared to deal with environmental (heritage) risks.</p>

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<p>maker Defence should outline its reasons for such a decision.</p>	<p>conditions on site, based on a risk assessment, and a site inspection to ground truth conditions.</p> <p>As a part of this review, the stone wall along the entire riverbank was identified as being of potential heritage significance by Brisbane City Council. However, further investigation determined the stone wall is not included in the Brisbane City Council heritage listing.</p> <p>The Environmental Assessment Report prepared for the Project by Defence's Environmental Assessment and Protection Branch states that "the redevelopment of the Navy Headquarters - South Queensland is unlikely to have significant impacts on matters protected by the EPBC Act. Therefore, there is no requirement to refer the activity</p>	<p>A Heritage Assessment of the Project site should result in the need:</p> <ul style="list-style-type: none"> (i) the preparation of a Heritage Management Plan (HMP); (ii) heritage issues to be managed in accordance with a HMP for the HMAS Moreton project; and (iii) a listing of the project site on the Defence Heritage Register as an unlisted place on the Defence estate that is known to have CH values. (iv) Consideration for referral to Minister (Environment and Energy) responsible for the administration of the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) for consideration to be entered in the Commonwealth Heritage List as a historic heritage place with Commonwealth Heritage Values and is Commonwealth owned land being used for Defence purposes. <p>See rows above relevant to concerns about heritage obligations and 2015 IER.</p>

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	to the Environment Minister for assessment and approval."	
If BRIG Beutel's statement about 80% of the heritage issues relate to the Disposal site than logically 20% of the Indigenous and non-Indigenous or European heritage issues relate to the Project site.	<p>BRIG Beutel's statement highlighted that the disposal site makes up 80% of the land currently owned by the Commonwealth and that it is known that there are items of Indigenous, non-Indigenous and European heritage on the disposal site.</p> <p>In accordance with the Brisbane City Council's proposed Masterplan, a Heritage Management Plan (including traditional owners) for the portion of the site to be disposed will be the obligation of the purchaser, subject to the proposed development of the land.</p> <p>The Initial Environmental Review</p>	<p>Defence should provide a response on the project site, which is the remaining 20% of the land currently owned by the Commonwealth, if it is also known that there are items of Indigenous, non-Indigenous and European heritage.</p> <p>HMAS Moreton site is Commonwealth owned land being used for Defence purposes and it is not bound by local government planning provisions such as Brisbane City Council's proposed Masterplan.</p> <p>A detailed heritage assessment has not been completed for HMAS <i>Moreton</i> so the Project team cannot be totally aware of potential issues and is therefore underprepared to deal with environmental (heritage) risks.</p> <p>See rows above relevant to concerns about heritage obligations and 2015 IER.</p>

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	<p>prepared for the project states that the warehouse is the only item considered to be of potential heritage value as it was likely constructed during WWII. However no alteration to the existing warehouse is proposed as a part of this Project.</p> <p>A detailed Heritage Assessment of HMAS <i>Moreton</i>, will be prepared in accordance with the Commonwealth, Queensland State and Local Government heritage criteria.</p>	
<p>At a meeting on Saturday 8 April 2017 between representatives of the Society and representatives of the Project team we specifically asked if aspects of heritage significance have been identified on the Project site and the Society was advised that only minor issues have been identified and any issues will be managed as part of the</p>	<p>The Initial Environmental Review prepared for the project states that the warehouse is considered to be of potential heritage value as it was likely constructed during WWII. However no alteration to the existing warehouse is proposed as a part</p>	<p>The Initial Environmental Review dated 2015 does not appear to identify all Commonwealth Heritage values or historically significant features. Therefore a Construction Environmental Management Plan cannot properly address all heritage issues. Defence's "Guidance on Preparing Construction Environmental Management Plans" (CEMP)²⁵ - identifies a list of commonly overlooked issues in CEMPs relating to the environmental aspects and Environmental Heritage is identified as one of these issues.</p>

²⁵ <http://www.defence.gov.au/estatemangement/governance/Policy/Environment/EIA/Guidance/CEMPGuidance.doc>

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<p>Construction and Environmental Management Plan.</p>	<p>of this Project.</p> <p>The detailed Heritage Assessment of HMAS <i>Moreton</i>, will be prepared in accordance with the Commonwealth, Queensland State and Local Government heritage criteria.</p> <p>As part of the mitigation measures identified by the Initial Environmental Review (attached at annex F), the Construction Environmental Management Plan will identify how to treat unknown cultural heritage sites if discovered during excavation works.</p>	<p>Defence heritage obligations to the community should ensure the detailed heritage assessment is completed and assessed as part of the HMAS Moreton Unit Relocation Project and any heritage assessment is made available to the public as part of community consultation.</p> <p>BDHS consider Commonwealth Heritage values are at risk and should be managed in accordance with a Heritage Management Plan (HMP).</p>
<p>A report commissioned by Defence from Jacobs dated 27 November 2014 identifies "Stone wall along the entire riverbank of Bulimba Barracks" (including the Project site) as "requiring more research and investigation" and based on a statement from</p>	<p>An Initial Environmental Review was prepared for the Project which involved a review of environmental and heritage conditions on site, based on a risk assessment, and a site</p>	<p>Defence's Initial Environmental Review prepared in 2015 does not appear to address Commonwealth Heritage values and all historically significant features, therefore a Construction Environmental Management Plan cannot properly address all Environmental Heritage issues. Defence's "Guidance on Preparing</p>

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<p>Lt Col. Pollard "an existing warehouse" also falls into this category.</p>	<p>inspection to ground truth conditions.</p> <p>As a part of this review it was identified that part of Bulimba Barracks has been heritage listed by the Brisbane City Council for its WWII heritage values. A stone wall along the entire riverbank was identified as being of potential heritage significance. However, further investigation determined the stone wall is not included in the Brisbane City Council heritage listing.</p> <p>The report also states that the warehouse is considered to be of potential heritage value as it was likely constructed during WWII. However no alteration to the existing warehouse is proposed</p>	<p>Construction Environmental Management Plans" (CEMP)²⁶ - identifies a list of commonly overlooked issues in CEMPs relating to environmental aspects and Environmental Heritage is identified as one of the issues.</p> <p>BDHS Issues of concern:</p> <ol style="list-style-type: none"> 1. Initial Environmental Review (IER) 2015 <ul style="list-style-type: none"> • Compliance with Commonwealth heritage obligations detailed in the 2015 Defence Estate Heritage Strategy for a historic heritage place and Defence Estate Quality Management System (DEQMS) which states "The first step in protecting heritage is identifying it!"²⁷. • Commonwealth Heritage (CH) values on a historic heritage place. • All historically significant features on the project site being the river wall; boat ramp and warehouse. • Brisbane City Council email dated September 2015 - evidence to Committee "there was no significant heritage value with the stone wall that was on the HMAS <i>Moreton</i> site and there is uncertainty surrounding the historical significance of that warehouse."²⁸ A review of 1946 aerial photo and

²⁶ <http://www.defence.gov.au/estatemangement/governance/Policy/Environment/EIA/Guidance/CEMPGuidance.doc>

²⁷ <http://www.defence.gov.au/estatemangement/governance/Policy/Environment/Heritage/Legislation.asp>

²⁸ http://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Public_Works/HMASMoreton/Public_Hearings

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	as a part of the HMAS <i>Moreton</i> Project.	<p>Department of Army plans 1957 clearly show the significant historical features including warehouse, river wall and boat ramp.</p> <ul style="list-style-type: none"> Defence's "Guidance on Preparing Construction Environmental Management Plans" (CEMP)²⁹ - identifies a list of commonly overlooked issues in CEMPs relating to the environmental aspects and Environmental Heritage is identified as one of these issues.
<p>The Society notes Defence has not identified heritage on the risk register associated with this Project but given the uncertainty raised in the statement by Lt Col. Pollard and "minimal risk" raised by BRIG Beutel it appears there potential risk.</p>	<p>An Initial Environmental Review was prepared for the Project which involved a review of environmental and heritage conditions on site, based on a risk assessment, and a site inspection to ground truth conditions.</p> <p>Based on the findings of this review, Heritage has not been identified as a risk as no works are proposed to any heritage</p>	<p>Heritage considerations - environmental (heritage) risks: The HMAS Unit Relocation Project is a re-development of a historic heritage place with Commonwealth Heritage (CH) values and proposed works are planned both on and in the vicinity of historically significant features, which include an existing boat ramp, river wall and timber beam and post warehouse. With regard to heritage considerations of the cultural and historical significance of the project site it appears Commonwealth Heritage (CH) values could be under threat because all cultural and heritage values and historically significant features have not been assessed and identified correctly and the project site has not been included on the Defence Heritage Register as an unlisted place on the Defence estate that is known to have CH values.</p>

²⁹ <http://www.defence.gov.au/estatemangement/governance/Policy/Environment/EIA/Guidance/CEMPGuidance.doc>

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	<p>items, and subsequently heritage was not identified in Defence's risk register due to conclusions drawn from the Initial Environmental Review and the Environmental Assessment Reports.</p>	<p>BDHS has concerns that evidence listed as “In addition and in support of these responses, relevant extracts from Defence's heritage mitigation measures as outlined in the Project's Initial Environmental Review are included at ANNEX E TO DGCFI/OUT/2017/AF29105796 JUNE 2017” shows that Defence contractor Aurecon document titled Project 248473 File IER - Bulimba Barracks Infrastructure Project.docx 9 October 2015 Revision 2 Page 6 does not reference Commonwealth heritage legislative references. The project site needs to address Commonwealth heritage obligations and legislation.</p> <p>BDHS has concerns that the IER has no actions required relevant to the project site which is an historic heritage place with Commonwealth Heritage (CH) values. The IER states only “Actions required: All personnel to be made aware of the significance of the heritage listed buildings and walls within and adjacent to the site, and the potential for artefacts to be located within the site”. This reference is to the disposal site.</p>
<p>It is clear from Defence evidence that there is uncertainty about heritage issues related to the Project site and therefore an assessment that these are "minor and the mitigation measures will be stipulated within a construction environmental management plan" is a subjective statement not supported</p>	<p>A detailed Heritage Assessment of HMAS <i>Moreton</i> will be prepared in accordance with the Commonwealth, Queensland State and Local Government heritage criteria.</p>	<p>Defence heritage obligations to the community should ensure the detailed heritage assessment is completed and assessed as part of the HMAS Moreton Unit Relocation Project and any heritage assessment is made available to the public as part of community consultation.</p>

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by evidence.		<p>A Heritage Assessment of the Project site which addresses the full range of cultural and heritage values, including Commonwealth Heritage (CH) values has not been done to date.</p> <p>A Heritage Assessment of the Project site should result in the need:</p> <ul style="list-style-type: none"> (i) the preparation of a Heritage Management Plan (HMP); (ii) heritage issues to be managed in accordance with a HMP for the HMAS Moreton project; and (iii) a listing of the project site on the Defence Heritage Register as an unlisted place on the Defence estate that is known to have CH values. (iv) Consideration for referral to Minister (Environment and Energy) responsible for the administration of the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) for consideration to be entered in the Commonwealth Heritage List as a historic heritage place with Commonwealth Heritage Values and is Commonwealth owned land being used for Defence purposes.
Lt Col. Pollard stated "There is no master plan" while in Department of Defence, Supplementary Submission to the PWC dated 21 April on Page F-6 it details "The site is Commonwealth land that sits within a	The statement made by Lt Col. Pollard is in relation to internal Defence master plans which are usually developed for each Defence establishment. The	BDHS reviewed PWC transcript of the public hearing on 5 May 2017 – Committee Member, Ms Justine Keay MP, Federal Member

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<p>Neighbourhood District Plan and the Bulimba Barracks Masterplan area", a planning instrument that recognises the heritage on the site.</p>	<p>referenced master plan is a: strategic land management document that is developed to identify and illustrate the optimal spatial allocation of land for the orderly development or re-development of the Defence Estate.</p>	<p>for Braddon asked "I will move on to the site for disposal. What is the zoning of that site now, or what could it potentially be?"³⁰</p> <p>Defence should note Ms Keay MP questions the disposal site and zoning.</p> <p>Whilst Commonwealth owned land currently being used for Defence purposes is not bound by local government planning provisions, it should be noted once the disposal site is sold it will then become bound by local government planning provisions.</p> <p>Local planning provisions show the HMAS Moreton site current zoning is special purpose zone code Defence zone precinct. "Defence zone precinct overall outcomes are: Development is located on land for defence and communication facilities administered by the Australian Government Department of Defence."</p> <p>The future zone for land which will adjoin the project site once defence land is sold will be Emerging Community Zone which allows urban development residential.</p> <p>On Tuesday 16 May 2017, Brisbane City Council adopted the Bulimba District Neighbourhood Plan amendment to Brisbane City</p>

³⁰ http://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Public_Works/HMASMoreton/Public_Hearings

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		<p>Plan 2014 to incorporate provisions of the Bulimba Barracks Master Plan. The amendment became effective on Friday 19 May 2017.</p> <p>The Bulimba Barracks precinct term is identified by the Brisbane City Council under the Bulimba district neighbourhood plan/NPP-004) and includes: Development for an emerging community zone and Development in the Royal Australian Navy sub-precinct.</p> <p>The Bulimba Barracks precinct includes the current HMAS Moreton site both the disposal site and project site.</p>