

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

**9 June 2017**

**Mr Scott Buchholz MP**

Chair

Parliamentary Standing Committee on Public Works

Parliament House

CANBERRA ACT 2600

Dear Mr Buchholz

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

1. The Bulimba District Historical Society inc (the Society) has made previous submissions dated 26 April 2017 and 17 May 2017 to the Parliamentary Standing Committee on Public Works (PWC) in relation to the HMAS Moreton Unit Relocation Project, Bulimba, Queensland (the Project).
2. The Society raises concerns that, to date, Defence has not:
  - a) undertaken appropriate research to determine the cultural and heritage significance of the project site and historically significant items;
  - b) conformed to Commonwealth legislation and requirements identified by PWC procedures;
  - c) given enough consideration to recognition of cultural and heritage values, including military history and how this can be preserved within the Bulimba community; and
  - d) appropriately addressed community concerns raised about a land based link on the southern boundary of the site adjoining neighbouring properties, emerging communities, Taylor Street Park and development sites along the river by providing an easement, appropriate screening and fencing and addressing conflict with a proposed new road and entry.
3. The concerns expressed in the April 2017 and May 2017 submissions have been reinforced by consultation that the Society has participated in and reading submissions to the PWC.
4. In evidence given before the PWC at a public hearing on Friday, 5 May 2017:
  - Brig. Beutel stated : "The initial environmental review for this, or the environmental review report that we undertake in full for this project, the proposed relocation of HMAS *Moreton*, said there is no referral required at all under the EPBC Act, the heritage risks are minor and the mitigation measures will be stipulated within a

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construction environmental management plan that will be supplied by the head contractor, subject to parliamentary approval.”

- Lt Col. Pollard stated: "At the point in time when we did the initial environmental review, there was uncertainty around a couple of items on the site and whether there was significance associated with them. One of them was the stone wall which separates the site from the river. That was confirmed with the Brisbane City Council, and they came back to us to confirm that there was no significant heritage value with the stone wall that was on the HMAS *Moreton* site. Further down on the surplus site, where there is an existing boat ramp, they considered that to be of historical value due to the nature and usage during World War II, but not down on our site."
5. The Society has provided detailed concerns to Defence in regard to referral under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). Please see following extracts from emails dated 8 June 2017:
- **“Defence’s environmental review report undertaken on the project site, clearly, does not meet Commonwealth legislative requirements in relation to the Commonwealth Heritage List and referral is required under the EPBC Act.”**
  - “Defence needs to reference the Australian Government, Department of the Environment and Energy, Identifying Commonwealth Heritage Values and Establishing a Heritage Register, A Guideline for Commonwealth agencies.”
  - “The link <http://www.environment.gov.au/heritage/management/referrals> you have sent me only relates to referrals under the EPBC Act relevant "To conserve and protect the heritage values of a World or National Heritage place, an action that has, will have or is likely to have a significant impact on those values may be referred to the Australian Government Minister for the Environment (the Minister) for assessment.” We have agreed the project site does not have any World or National Heritage values. Therefore, this information does not relate to your project site.”
  - “The link <http://www.environment.gov.au/resource/identifying-commonwealth-heritage-values-and-establishing-heritage-register> I sent you clearly identifies each Commonwealth agency has a responsibility to undertake an assessment process to identify which of the places they own or control have Commonwealth Heritage values. **The Commonwealth Heritage List can include places connected to defence.**”
  - “Furthermore relevant information states: "To ensure your assessment meets the legislative requirements it is imperative that the Commonwealth Heritage criteria are used. The criteria relate to the place’s natural and cultural environment having aesthetic, historic, scientific or social significance, or other significance.”
  - “The Commonwealth Heritage List, established under the EPBC Act, comprises natural, Indigenous and historic heritage places which are either entirely within a Commonwealth area, or outside the Australian jurisdiction and owned or leased by the Commonwealth or a

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Commonwealth Authority; and which the Minister is satisfied have one or more Commonwealth Heritage values.”

- “The Commonwealth Heritage criteria apply to the historic heritage values of places.”
- “Please note the guideline references: **“WHEN SHOULD AN ASSESSMENT OF COMMONWEALTH HERITAGE VALUES BE UNDERTAKEN?”**
- “As outlined above, an assessment of Commonwealth Heritage values generally forms part of the agency’s heritage strategy. If your agency has already prepared its heritage strategy, it will include a deadline by which your agency has agreed to assess places for Commonwealth Heritage values. More detailed information on heritage strategies can be found in the guide - *Working Together: Managing Commonwealth Heritage Places* which is available at:

[www.environment.gov.au/heritage/publications/protecting/working-together-commonwealth.html](http://www.environment.gov.au/heritage/publications/protecting/working-together-commonwealth.html)

Other factors which may influence the timing of the assessment of an agency’s places for Commonwealth Heritage values include:

- potential disposal
  - change in use
  - pending development needs.”
- “I have requested you please seek advice on Defence's "initial environmental review report” subject to Commonwealth legislative requirements in relation to the Commonwealth Heritage List and referral required under the EPBC Act. **I would appreciate your clarification of these concerns.”**

6. The Society requests the PWC hold a public hearing in Brisbane with individuals and organisations who have made comment on the proposal for the Project.
7. The Society has reviewed the Parliament of Australia, Parliamentary Standing Committee on Public Works (PWC) website<sup>1</sup> and noted the PWC Procedure Manual details Committee responsibilities and processes including 1.22, 1.23 and 1.24.<sup>2</sup>
8. 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*.<sup>3</sup>

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<sup>1</sup> [http://www.aph.gov.au/Parliamentary\\_Business/Committees/Joint/Public\\_Works](http://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Public_Works)

<sup>2</sup> PWC-Procedure Manual-9th Edition-Nov 2016.pdf

<sup>3</sup> <https://www.legislation.gov.au/Details/C2012C00761>