

Public comments

Key theme	Defence response
<p>Consultation process</p> <p>Submissions called for further consultation regarding the proposed action. Key points raised by submitters included:</p> <ul style="list-style-type: none"> – Inadequate timing and duration of public consultation. Public comment was invited on the Preliminary Documentation from 27 March 2024 to 11 April 2024 in accordance with the 10 business days public comment period stipulated in the EPBC Act. This period included Easter and coincided with Victorian school holidays – The public consultation period under the EPBC Act is different to consultation required under State legislation (such as the <i>Environment Effects Act 1978</i>) for projects that are not being undertaken on Commonwealth land. – Notification process – key stakeholders in air force and aviation history were not specifically identified and invited to make comment and submission – Request for extension of the consultation period, particularly given the length of the Preliminary Documentation – Request for at least one town hall meeting to step through the nature of the proposal, and gain consensus where possible on the way forward. – Request for one stakeholder visit of the site including community leaders and media representatives 	<p>The timing and duration of the public notice period is administered by DCCEEW and is not able to be altered by Defence. Where late submissions have been received, these have continued to be accepted and will be addressed.</p> <p>This is different to the consultation requirements for projects for which is an Environment Effects Statement is prepared pursuant to the <i>Environment Effects Act 1978</i> (EE Act). The EE Act is Victorian legislation and does not apply to the proposed action.</p> <p>Extension of consultation for the proposed action which relates to building removal on safety grounds is not warranted. The RAAF is very conscious of preserving this Base and has already upgraded 10 Bellman Hangars to commemorate the WW1 & WW2 precincts on the Base. As documented in the HIAs (ERM 2019, Biosis 2019), Defence has retained and conserved or relocated significant heritage assets where feasible.</p> <p>Defence is committed to ongoing consultation with stakeholders such as the Air Force Association Victoria as the proposed action progresses, and beyond</p>
<p>Previous plans for the Base and concurrent Defence estate planning</p> <p>A number of submissions referenced past planning for management of assets at RAAF Base Point Cook, as well as concurrent Defence estate planning. The following matters were raised:</p> <p>The <i>RAAF Base Point Cook Strategic Land Use Plan for Discussion at Working Group: Working Book (November 2002)</i>, released as part of the public consultation undertaken when the Department was considering sale of the Base. Its development was guided by a project steering committee comprising representatives from the Department of Defence, other federal agencies, Victorian Government agencies and the Wyndham City Council and responded to feedback from various working groups and public information days (this document was not finalised as the sale of the land did not proceed)</p> <p>In 2004, RAAF Base Point Cook was proposed to be kept in public ownership and managed by a non-profit trust.</p> <p>The Government has conducted an Independent Estate Audit of the whole of Defence's estate and the audit report was submitted to Government at the end of 2023. It is premature to undertake consultation on a proposed demolition of any part of the Defence estate before the Government's response to the audit is received.</p>	<p>RAAF Base Point Cook Strategic Land Use Plan is more than 20 years old and was created to inform the future use of the Base. Given that a sale did not proceed, this is not relevant to the current action which relates to a still active Defence establishment.</p> <p>The Base was returned to the RAAF as an operating airbase in 2007. The Trust was not successful in seeking support. The Base has been upgraded in many areas:</p> <ul style="list-style-type: none"> – The AFC-RAAF Memorial precinct has been upgraded to meet heritage requirements. – RAAF Precinct is upgraded for public access. <p>The proposed action is based on flying safety concerns and started in 2018 to address ongoing operational requirements at RAAF Base Point Cook. The proposed action has followed the correct process to address a small quantity of unsafe buildings.</p> <p>The options for those buildings proposed to be demolished is very limited due to serious rust and structural deterioration. They detract from the value of the 1920-30 buildings that are being retained. Defence has examined all alternatives to demolition since 2012 and demolition is the desired outcome to meet flying safety considerations. The RAAF Base Point Cook is an operating airfield home to 100SQN and RMIT Flying School.</p>

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	<p>The RAAF is only proposing removal of a very small quantity of degraded unsafe buildings from the site. 90% of the existing buildings will be kept. Future redevelopment of this National Heritage listed site is proposed if approved by government.</p> <p>After the Estate Audit is released, there may be a case for wider public consultation, but Defence again notes that this is a very small, controlled proposal to meet safety concerns on the airfield.</p>
<p>Relevance of Victorian legislation and planning scheme provisions</p> <p>The TCPA in its submission calls for the Preliminary Documentation to address the provisions of the Wyndham Planning Scheme, and to demonstrate compliance with the intent of State legislation.</p> <p>The submission states that Defence does not appear to have consulted with relevant Victorian government departments or Wyndham City Council.</p> <p>For example: “in Attachment 10 to the PD Report’s discussion of contamination risks from PFAS, Figure 1 (Page 13 – some 946 pages into the combined document) shows the sensitivity of water bodies to inflow from ground water sources, in this case a PFAS plume. It is of concern, given the range of Victorian legislation that apply to the coastal areas and waters of Port Phillip Bay, that there appears to have been no input from Parks Victoria, the Environment Protection Authority, the Department of Transport and Planning and the Department [of] Energy, Environment and Climate Action.</p> <p>The TCPA notes that such referrals would be a requirement of any assessment or application for permit under the <i>Environment Effects Act 1978</i> and the <i>Planning and Environment Act 1987</i>.”</p>	<p>As stated in the Preliminary Documentation (section 3.3, p. 12), Defence aims to comply with the intent of State legislation and local government provisions, to the extent that these provisions are not inconsistent with Commonwealth requirements.</p> <p>It is noted that the action does not extend beyond Commonwealth land, nor will it result in any interface concerns given that the proposed action is limited to demolition.</p> <p>Section 4.6.2 of the Preliminary Documentation confirms that PFAS CSR locations will not be impacted by the proposed action. The comment refers to existing circumstances, which are subject to ongoing management measurements and will not be changed by the proposed action.</p>

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<p>Overall impact to heritage values</p> <p>A number of submissions emphasised the importance of RAAF Base Point Cook as the first military aviation base in Australia and as the birthplace of the RAAF in 1921.</p> <p>Submitters expressed their opposition to the proposed action based upon the heritage value of the buildings that are proposed to be demolished, and their contribution to the overall heritage value of RAAF Base Point Cook, noting its inclusion on the National Heritage List and Commonwealth Heritage List.</p> <p>A key theme reiterated in many submissions was that the heritage buildings are important to Australian history and should be retained for future generations.</p> <p>Many submitters cited a personal connection to RAAF Base Point Cook.</p>	<p>Defence acknowledges the role that RAAF Point Cook has played in the history of the RAAF but as the Base remains an active military airfield, a balance must be struck between preservation of heritage and ensuring that it remains a functional asset.</p> <p>The RAAF values RAAF Base Point Cook as the birthplace of the RAAF in 1921. The Base has had considerable upgrade over the past ten years and retention of significant buildings fought on an annual basis against financial realities of maintenance costs. We celebrated our Centenary here in 2021 and 2022 despite COVID restrictions and restriction to public access.</p> <p>The RAAF must take a balanced heritage approach against the funding available from government for the heritage estate. This requires a staged approach in order for the funding to be secured and units to decant and move as appropriate facilities where refurbished. We are retaining all the Seaplane Hangar assets on the Southern Tarmac and ongoing refurbishment has occurred. The RAAF Aviation Heritage Collection Manager has 80% of the Aviation Heritage items stored in hangars at RAAF Base Point Cook. It has always been the RAAF's intent to retain heritage assets where possible.</p> <p>The buildings proposed to be removed have reached the end of their useful life and pose an operational risk to airfield operations through FOD due to their deteriorated condition.</p> <p>Defence acknowledges that ongoing use of vacant and disused heritage buildings aid in maintaining the fabric of heritage places.</p> <p>Ultimately the RAAF's desired end state for RAAF Base Point Cook is to restore military training and operational capabilities to the Southern Tarmac Precinct, house military heritage and civilian air training at the Western Tarmac Precinct and move the RAAF Museum to the northwest of the site so it can be placed 'outside the wire'. This end state would retain the WWI layout of the Southern Tarmac Precinct and the WWII layout of the Western Tarmac Precinct, allow refurbishment and ongoing use of key built heritage assets and optimize public engagement with RAAF heritage.</p> <p>Removal of the buildings will allow for RAAF Base Point Cook to continue as a nationally significant, both historically and operationally, Base into the future.</p>

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<p>Retention of specific buildings or building elements</p> <p>A number of submissions proposed that the buildings to be demolished should instead be restored and retained for their heritage value, even if they are not reused.</p> <p>AHSA's submission included the following recommendations for the retention of buildings at RAAF Base Point Cook:</p> <p>(A) 1x Historic Hazardous/Inflammable Armament Store (Asset 122)</p> <p>The building asset 122 is a unique Interwar Building, its main structure is in good condition, it relates to the important military aviation role of armament storage and is a unique survivor and not replicated on other RAAF Bases. Its loss is assessed as having an adverse and indirect impact to the Historic Southern Tarmac Precinct. It should be repaired, sealed to limit entry, and disconnected from water and power supply to avoid risk to the building, and maintained externally ongoing (a treatment which has been applied to many other empty buildings not suitable to adaptive re-use on the base). The Heritage Assessment is clear that it is a unique survivor and also considered an attribute to the National Heritage Listing.</p> <p>(B) 1x WWII Store Building on the Southern Tarmac (Asset 221)</p> <p>The building asset 221 is a unique World War II Store Building, its main structure is in good condition, its loss is assessed as having an adverse and indirect impact to the Historic Southern Tarmac Precinct. The Heritage Assessment is clear that it is a unique survivor but also considered an attribute to the National Heritage Listing. It should be stripped of its asbestos (which would be required prior to demolition in any case), and instead repaired and reclad in metal cladding of similar profile to the removed asbestos cladding.</p> <p>(C) 4x Bellman Hangars (Assets 211, 212, 213 & 214) on the Southern Tarmac.</p> <p>The 4 Bellman Hangars on the Southern Tarmac are in poor condition, but most of that relates to the loose cladding (which has not been replaced since WWII other than Hangar 212 which was replaced in 1999) and some of the bases of the upright supports where poor or non-existent roof guttering and drainage has resulted in water pooling at their bases (i.e. lack of maintenance, despite the listing of the site onto the NHL in 2007, has contributed to the current condition 17 years later).</p>	

Their loss is assessed as having an adverse and indirect impact to the base overall but also to the WWII aspects of the Southern Tarmac Precinct. There has been stated ambitions in the past to try and remove all of the WWII buildings from that precinct and to only preserve its WW1 and inter-war heritage, including relocation of the 1914 Aeroplane Hangar building 210 but that is not appropriate or indeed practical.

It is understood that these 4 Bellmans were some of the earliest of their type erected anywhere in Australia, and it is understood at least one (building 211) if not a second (building 214) are the only surviving examples of British-built Bellman Hangars shipped to Australia as patterns for the local manufacturing by Lysaght Steel – this was identified by Trevor Huggard and Associates Consulting Engineers in 2006.

While ideally all 4 could be retained and restored, providing much-needed undercover storage, the appropriate action would be to demolish Bellman Hangars 212 and 213, (and perhaps even 214, if 211 is the only UK-built example), which would have the effect of opening up the vista of the two surviving WW1 Battleplane Hangars and the Seaplane Hangar and reducing the maintenance work load by at least 2 Bellman Hangars, while retaining at least one if not two WWII Hangar examples on the Southern Tarmac and retaining at least one if not two of the only two known examples in Australia of the UK-built Bellmans.

The components from 212, 213 (and 214) could be salvaged to repair the base sections of the damaged uprights of Bellman Hangar 211 and replace damaged doors and outriggers, and 211 could be re-clad to provide additional undercover storage to the RAAF Museum, or other RAAF Aircraft.

Bellman Hangar 211 (and possibly 214), along with Base Store 221, would then at least retain some elements of WWII heritage on the Southern Tarmac, as well as if refurbished, provide additional under cover storage for the RAAF Museum or visiting aircraft.

(D) 9x RAAF Standard Huts (Assets 203, 243, 485, 190, 228, 125, 155, 156, and 158)

The 9 RAAF Standard Huts proposed for demolition are in various locations and in various conditions and hence deserve different considerations.

Buildings/Assets 203, 243 and 485 should be permitted to be demolished as proposed (unless if Hangar 212 is retained, in which case its associated hut 203 should also be retained), but 243 and 485 are not in their original sites and both are in poor condition. Given the likely loss of Hut 203, its equivalent hut on the Northern Tarmac - Hut 190, (adjacent to Northern Tarmac Hangar 183) should instead be retained, as originally most of the outward facing Bellman Hangars at Point Cook had an adjacent hut next to the taxiway.

Hut 228 forms part of the Merz Road WWII Huts Precinct, and hence its loss reduces the integrity of that precinct.

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<p>Huts 125, 155, 156 & 158 should be retained, and could be disconnected from power and water, and simply sealed in their current condition, and only have external maintenance into the future.</p> <p>(E): 2x Toilet Blocks (Assets 102 / 218) and 2x Misc Huts/Stores (Buildings / Assets 112 and 132)</p> <p>These 4 buildings (102, 112, 132 and 218) are considered intrusive, or of no specific heritage value and in poor condition not to warrant retention.</p>	