

Department of Defence
Annual Environmental Compliance Report 2020

EPBC reference 2014/7123
Removal of heritage buildings at RAAF Base Amberley
near Ipswich, Queensland

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Document Version Control

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4	29 Sep 2020	Kerry Taloni	Final

Declaration of accuracy

In making this declaration, I am aware that sections 490 and 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed	
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Position (please print)	Director Defence Environmental Planning Assessment and Compliance
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Date	1 October 2020

1. Description of activities

On 29 January 2014, the Department of Defence (Defence) referred the removal of 38 structures mentioned in the Commonwealth Heritage List (CHL) for RAAF Base Amberley (near Ipswich in southern Queensland) for consideration under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) (EPBC reference: 2014/7123).

The action was deemed to require assessment and approval by the Minister for the Environment under section 28 of the EPBC Act (protection of the environment from Commonwealth actions). A Preliminary Documentation assessment method was conducted and the action was approved, subject to conditions, on 9 June 2015.

Condition 9 of EPBC Act approval 2014/7123 requires an annual compliance report to be published on Defence's website by 1 October of each year following the commencement of the action, to address Defence compliance with the conditions of this approval over the previous 12 months. This includes implementation of any management plans and strategies required in the conditions.

The approved action commenced on 14 October 2016. The first annual compliance report was published in late September 2017. This is the fourth annual consecutive compliance report submitted for this project. The report is published on the Defence environmental compliance reporting website at <http://www.defence.gov.au/id/Environmental.asp> as part of Condition 9.

2. Compliance table

The following table identifies each condition of approval and evidence of compliance.

Table 1 – Compliance against EPBC Act conditions of approval

Condition number	Condition	Compliance	Evidence / comments
1	The approval holder must not demolish any heritage buildings, or parts thereof, except as indicated in the project area.	Compliant	38 CHL-cited buildings have been identified within the project area and no heritage buildings outside of this area have been demolished. Demolition of a number of buildings has occurred in accordance with conditions in this approval. There remain some buildings that are occupied and do not have a known date for demolition.
2	To ensure that information on the heritage-listed buildings on the Amberley RAAF Base Group Commonwealth heritage listed site is retained, prior to commencement of the action the approval holder must undertake archival recording of all heritage buildings in the project area. This recording must: a. Be in accordance with the guidelines set out in the Queensland Department of Environment and Heritage <i>Archival Recording of Heritage Places</i> (2013); b. Include an archival photographic record of the heritage buildings within the project area. This must be undertaken by a photographer with experience in compilation of archival records and include satellite imagery or photography from an aircraft to capture aerial images of the base; c. Include a technical description of the precincts, buildings and operations, as well as oral accounts with people associated with the airbase;	Compliant	An archival recording of all CHL-cited buildings and structures in the project area was completed in February 2016. The Archival Report was prepared by Defence consultants, RPS Project Management, to address all requirements in condition 2. The Archival Report is available on Defence's environmental compliance reporting website at http://www.defence.gov.au/id/Environmental.asp a. The archival recording was undertaken in accordance with the Queensland Department of Environment and Heritage <i>Archival Recording of Heritage Places</i> (2013) guidelines. b. RPS Regional Cultural Heritage Technical Director undertook photographic archival recording of the 38 CHL buildings. RPS surveying and mapping undertook aerial photography of the 38 CHL buildings using an Unmanned Aerial Vehicle (UAV). These elements are included in the Archival Report. c. RPS consulted the Amberley Base Regional Environmental Officer, 23SQN Historian and RAAF Base Amberley Heritage Centre OIC, and also undertook additional research to capture. Oral accounts from five people associated with the airbase were filmed in the Heritage Centre. These are described in the Archival Report and the oral histories are included as appended DVD's to the Report.

	d. Include a description of the equipment and techniques employed in compilation of the record; e. Include a catalogue of all images, referenced to location plans; f. Include measured drawings, comprising floor plans, elevations of each building element and roof plans. These must include a description of the measurement techniques employed to produce the drawings; g. Include 3D digital recording of the assets in their current context in order to generate virtual models of the place; h. Be lodged with the National Archives of Australia, the State Library of Queensland's John Oxley Library and the Ipswich Central Library; and i. Be available to view online at no monetary cost, in an easily accessible form, from the State Library of Queensland's John Oxley Library or similar website, for at least the life of the approval.		d. The Archival Report includes a description of the equipment and techniques used to undertake archival recording of the CHL buildings. e. The Archival Report includes a catalogue of all images, referenced to location plans. f. RPS used 3D survey data to create measured drawings (floor plans, elevation and roof plans) for each building. The Archival Report includes a description of the measurement techniques used to produce the drawings and these drawings are included in the Archival Report. g. RPS surveyors undertook 3D digital recordings of the CHL buildings in their current context, allowing for the generation of virtual models of the place. The output of these recordings are included in the Archival Report. h. Defence approved the final Archival Report on 03 February 2016. The Archival Report was provided to the State Library of Queensland's John Oxley Library and the Ipswich Central Library for lodgement on 26 February 2016. Both institutions confirmed receipt of and therefore lodgement of the report. On 13 May 2016, Defence advised the then, Department of the Environment and Energy (DoEE) that lodging the Archival Report with the National Archives of Australia is subject to Australian Government archival policy which requires documents to be held by departments and agencies for a minimum period of 7 years before they are eligible for transfer to the National Archives. i. Defence has made the Archival Report available for download from its website at: http://www.defence.gov.au/id/Environmental.asp which will be available on the for at least the life of the approval.
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3	Prior to the commencement of the action, the approval holder must submit for the Minister's approval a Heritage Interpretation Plan for RAAF Base Amberley with a focus on the phases of historic development of the airbase. The Heritage Interpretation Plan must: - Be prepared in consultation with the Department; - Identify opportunities to utilise media produced by the archival recording process outlined in Condition 2; - Identify opportunities to utilise material or moveable items salvaged from the project area where this is practical; - Include a timeline for the implementation of the interpretation works; - Include the necessary content and specifications for a public display or exhibition of material that communicates the history of RAAF Base Amberley; - Include the necessary detail and specifications to enable publication of a book that captures the heritage values of RAAF Base Amberley. The book must: - Be available in hard copy; - Be available to view online at no monetary cost, in an easily accessible form, from the State Library of Queensland's John Oxley Library or similar website, for at least the life of the approval; - Be identified by an International Standard Book Number (ISBN); - Be published in accordance with Australian Government publishing guidelines including the <i>Style Manual; For Authors, Editors and Printers, 6th Edition</i>, and be publicly accessible through the Commonwealth Library Deposit and Free Issue Schemes; and	Compliant	The RAAF Base Amberley Heritage Interpretation Plan (2016) (HIP) was approved by the then DoEE on 13 May 2016 prior to commencement of the action on 14 October 2019. - Defence provided the HIP to Environment Department for review and comment on 24 November 2015, 30 March 2016 and 09 May 2016. - The HIP included options and recommendations for how the recorded archival media would be used and presented. - Recommendations were included in the HIP with regard to how the materials/moveable items salvaged from the project area could be used. - The HIP included a proposed timeline for the implementation of the interpretation works. - Recommendations were included in the HIP for the necessary content and specifications for a public display or exhibition of material that communicated the history of RAAF Base Amberley. - Specifications listed at Condition 3f. i-v, to enable publication of a book capturing the heritage values of RAAF Amberley, and further specifications to inform a design brief for the book, were included in the HIP. - The book titled, '<i>The heritage values of RAAF Base Amberley – From Hornet Moth to Super Hornet</i>' was published by Defence Publishing Services in September 2019. The book is available in hard copy and has been distributed. - The book is available for download from Defence's website at: http://www.defence.gov.au/id/Environmental.asp - The book has the following ISBN's: - Print: ISBN 978-1-925890-03-7 - Online: ISBN 978-1-925890-05-1" - The book was produced in accordance with the Australian Government publishing guidelines, including the Style Manual. The book has been made publicly accessible through the Commonwealth Library Deposit and Free Issue Schemes.
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	v. Be prepared with the involvement of relevant publishing professionals for the editorial and design of the book, as well as a historian of RAAF No. 23 Squadron Association and any other relevant historians involved with RAAF base Amberley for the content material. The approval holder must not commence the action until the Heritage Interpretation Plan is approved by the Minister. The approved Heritage Interpretation Plan must be implemented.		v. The book was prepared in consultation with the historian of RAAF No. 23 Squadron Association, the RAAF Museum Point Cook, the RAAF Historian and the Air Force Heritage director. A focus group of relevant Base representatives with ample local and historical knowledge participated in sourcing and verifying content material. The first draft manuscript of the book was reviewed by a select group of Defence stakeholders. Comments were collated and where appropriate incorporated into the final draft. The RAAF Historian was heavily involved in finalising all outstanding issues with the draft manuscript. The RAAF Historian provided written agreement of the book and the foreword on 22 November 2017. Environment Department approved the HIP on 13 May 2016. Defence (DEPA, now DEPAC) provided notification to Environment Department regarding the commencement of the action twice. The first time was on 20 July 2016 regarding works involving the relocation of the Commonwealth Heritage Listed (CHL) building no.467 under the Growler project. The second time was on 14 October 2016 to advise demolition of 10 CHL buildings, no.'s 95-104, and the Lysaght Huts under the Battlefield Airlifter (BFA) project. Defence commenced with the implementation of the HIP as specified in the approved HIP. Interpretive displays and signage to convey the history of RAAF Base Amberley have been developed and are being finalised. These will be installed in more than six locations around the Base as per the HIP. Defence anticipates these will be installed towards the end of 2020.
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4	To minimise the impacts to heritage values resulting from the action, within three years of the commencement of the action, the approval holder must: a. Relocate at least one Bellman hanger, at least two P1-type timber huts and at least one Starter Cartridge store/Explosives Locker to a suitable location for adaptive re-use on the site of RAAF Base Amberley. The approval holder must ensure that relocation of these buildings will not impact upon any existing heritage values at the relocation site; b. Salvage components of demolished Bellman hangars to support the maintenance of other retained Bellman hangars where this is practical; and c. Offer surplus Bellman hangars and P1 timber huts to aviation history organisations for removal and relocation.	Compliant	Completed within three years of the commencement of the action: a. Bellman hangar 260 (originally hangar 255) contains fabric from both hangars. It was relocated for adaptive reuse by the Australian Air Force Cadets (AAFC), which was completed in March 2019. Under the R80092 Growler project, a Starter Cartridge locker (asset 764) was relocated and installed at the Amberley heritage centre. Works to relocate and adaptively re-use the double P1 type hut (asset 467), formerly known as the ARDU building or former Air Safety Building, for cadet use was completed in April 2020. b. Hangar 260 contains fabric used from the former Bellman hanger, no. 255. During the dismantling of Bellman Hangars under R8004 Battlefield Airlifter Facilities Project, offers to use salvaged parts for other Bellman hangars on the Defence estate were made to RAAF Base Point Cook and to RAAF Amberley. No offer was taken up to accept salvaged components as it was logistically and financially unviable to send components to RAAF Point Cook, and all Hangars at Amberley were being removed under this Approval. c. Defence received a number of enquiries from parties seeking surplus Bellman hangars and P1 huts. Air Force History and Heritage Branch coordinated the gifting of Hangars to aviation heritage organisations. The Phillip Island Vietnam Veterans Club, a receiving organisation, removed three (dismantled) hangars in January 2019. All dismantled hangars were removed from the site.
5	To ensure the ongoing protection of heritage values following the action, the approval holder must submit a Heritage Management Plan for the Minister's approval within twenty-four months of the commencement of the action. The Heritage Management Plan must: a. Outline guidance for the management and promotion of heritage values at RAAF Base Amberley; and	Compliant	In progress. a. A Heritage Management Plan (HMP) to address the requirements of this condition was prepared and a draft submitted to Environment for review and comment on 24 July 2018 in accordance with S341ZS of the EPBC Act. The Department of Environment consulted with the Australian Heritage Council and wrote to Defence on 25 September 2018 to confirm that the draft HMP was not inconsistent with the Commonwealth Heritage Management Principles. Some minor edits were identified by the Australian Heritage Council and these are being addressed as part of the revision of the HMP to be undertaken after consultation with Traditional Owner groups has been completed.

	b. Include an assessment report of Commonwealth heritage values that remain at RAAF Base Amberley. The assessment report must be undertaken in accordance with the Department's <i>Commonwealth Heritage List Historic Heritage Assessment Guidelines</i> and submitted to the Department upon completion. The approved Heritage Management Plan must be implemented.		b. Defence completed an assessment of Commonwealth historic heritage values remaining at RAAF Base Amberley and submitted the subsequent report to the Department of Environment on 15 August 2016. The assessment was undertaken in accordance with DoEE's <i>CHL Historic Heritage Assessment Guidelines</i>. Defence is currently consulting with relevant Traditional Owner groups about Indigenous heritage values at RAAF Base Amberley. Initial consultation meetings and a site walk over were undertaken in the first quarter of 2020. Subsequent consultation has been delayed due to COVID-19 social distancing and travel restrictions. Defence's intention is to finalise and submit the HMP for approval after consultation with relevant Traditional Owner groups has been completed and incorporated into the document. The current program is for completion in mid-2021. Defence is using the draft HMP as an operational draft HMP. The draft heritage management plan notes that further revision of the HMP needs to occur, once the consultation process with Traditional Owner groups has been completed and incorporated into the HMP.
6	To avoid and mitigate impacts to any Koalas within the project area, the approval holder must undertake management measures including, but not limited to: a. The development and implementation of a plan for relocation activities; b. Engagement of a qualified fauna spotter-catcher to undertake surveys prior to commencement of the action; and c. If Koalas are found in the project area, any handling of Koalas required to relocate or otherwise protect them prior to and during the action in accordance with the plan for relocation activities.	Compliant	The requirements of condition 6a. to 6c., for the protection of any Koalas within the project area, are being implemented and managed through Defence's Environmental Clearance Certificate (ECC) process. The management measures contained in the ECC are continuing to be implemented to ensure the requirements of this condition, to avoid and mitigate impacts to any Koala are met until all physical works under the approval have been completed onsite and within the project area.

7	Within 30 days after the commencement of the action, the approval holder must advise the Department in writing of the actual date of commencement.	Compliant	Defence notified the then DoEE on 20 July 2016 that initial works to prepare a CHL-cited building (Asset number 467) for relocation on Base had commenced. On 14 October 2016, Defence notified Environment that action had commenced to demolish 10 CHL-cited buildings (Asset numbers 95 to 104 (Lysaght sheds). 14 October 2016 is considered the actual date of commencement noting the significance of the event to demolish CHL-cited buildings at RAAF Base Amberley.
8	The approval holder must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the plans and strategies required by this approval, and make them available upon request to the Department. Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, or used to verify compliance with the conditions of approval. Summaries of audits may be posted on the Department's website. The results of audits may also be publicised through the general media.	Compliant	Accurate records of all activities relevant to the conditions of approval, including the implementation of plans, are maintained in Defence's official electronic recordkeeping system.
9	By 1 October of each year after the commencement of the action, approval holder must publish a report on its website addressing compliance with the conditions of this approval over the previous 12 months, including implementation of any management plans and strategies as specified in the conditions. The Approval Holder may discontinue publishing annual compliance reports with the written agreement of the Minister.	Compliant	The actioned commenced on 14 October 2016. The first annual compliance report was published on 27 September 2017. This is the fourth consecutive annual compliance report. Defence publishes all EPBC Act annual compliance reports on its website at: http://www.defence.gov.au/id/Environmental.asp

10	Non-compliance with any of the conditions of this approval must be reported to the Department within 48 hours of discovery by the approval holder.	Not triggered	No non-compliances occurred.
11	If the approval holder wishes to carry out any activity otherwise than in accordance with the plans and strategies specified in the conditions, the approval holder must submit to the Department for the Minister's written approval a revised version of that plan or strategy. The approval holder must not commence the varied activity until the Minister has approved the varied plan or strategy in writing. The Minister will not approve a varied plan or strategy unless the revised plan or strategy would result in an equivalent or improved environmental outcome over time. If the Minister approves the revised plan or strategy, the approval holder must implement that plan or strategy in place of the plan or strategy previously approved.	Not triggered	

12	If the Minister believes that it is necessary or convenient for the protection of the environment to do so, the Minister may request that the person taking the action make specified revisions to the plans and strategies specified in the conditions and submit the revised plan or strategy for the Minister's written approval. The person taking the action must comply with any such request. The approval holder must implement the revised approved plan or strategy. Unless the Minister has approved the revised plan or strategy, then the revised approved plan or strategy must continue to implement the plan or strategy previously approved, as specified in the conditions.	Not triggered	
13	If, at any time after 7 years from the date of this approval, the approval holder has not substantially commenced the action, then the approval holder must not commence the action without the written agreement of the Minister.	Not applicable	Defence commenced action on 14 October 2016. All approval conditions have either been completed or have substantially commenced.
14	Unless otherwise agreed to in writing by the Minister, the approval holder must publish all plans and strategies referred to in these conditions of approval on its website. Each plan and strategy must be published on the website within 1 month of being approved and must remain published for the life of the approval.	Compliant	All plans and strategies are published at: http://www.defence.gov.au/id/Environmental.asp The Defence Estate Quality Management System (DEQMS) Manager maintains the Defence environmental compliance reporting website. All compliance documents remain published for the life of the approval.
15	Unless otherwise agreed to in writing by the Minister, the approval holder must provide a copy of each approved plan and strategy referred to in these conditions of approval to members of the public upon request. Copies must be provided within a reasonable time of the request.	Not triggered	No requests for plans or strategies have been made. Public access to all plans and strategies however are available on the Defence environmental compliance website http://www.defence.gov.au/id/Environmental.asp

3. Correcting non-compliances

No non-compliances identified by the project.

Table 2 – Corrective Actions

Details of Non-Compliance	Corrective Action	Effectiveness
N/A	N/A	

4. New environmental risks

No new environmental risks identified by the project.