

# Bankstown Airport Aviation Hangar Project

Statement of Heritage Impact

Report to Aeria Management Group

June 2024



 artefact

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## EXECUTIVE SUMMARY

### Project background

Aeria Management Group (formerly Sydney Metro Airports) are proposing development options on the terminal-tarmac intersection at Bankstown Airport. The proposal aims to strengthen Bankstown Airport's position as a regional airport offering training, maintenance, and personal aviation, whilst ensuring that the evolving needs of tenants are met. The proposal seeks to overhaul the existing buildings, taxiways, and aircraft hangars to improve both airside and landside operations, as well as improve employee and pedestrian access and safety. The proposed works include the construction of:

- Seven aircraft hangars. Three hangar types would be constructed, ranging from 24m to 34m in width, with a height of around 13.5m. Total hangars would occupy an area of around 7,800m<sup>2</sup>
- Two external mechanical tanks to the west
- Administration/office facilities (ancillary support zone), occupying an area of around 1,500m<sup>2</sup>
- Carparking, including 66 car spaces

Landscaping, including plantings and on-site detention features Bankstown Airport is located on Commonwealth land, leased to Bankstown Airport Proprietary Limited on a long-term lease. There are no formal heritage protections which are associated with the Chevron Precinct, which is located adjacent to the east of the study area. Bankstown Airport is however listed as 'Bankstown Aerodrome' on the Bankstown Local Environmental Plan 2015 (Item no. 118). The 1970s Air Traffic Control Tower is listed on the Commonwealth Heritage List (Place ID #106118), although this site is beyond the study area, located approximately 650m south-west of the study area.

As part of the development options for Bankstown Airport, an area called the Aviation Hangar Project in the northern portion of the airport is being explored for redevelopment. Artefact Heritage have been engaged by Aeria Management Group to prepare a Statement of Heritage Impact for the Bankstown Airport Aviation Hangar Project.

### Scope of the report

This Statement of Heritage Impact identifies the relevant statutory and regulatory contexts for the proposal and provides a detailed assessment of the historical and heritage context of the Bankstown Airport Aviation Hangar Project. The Statement of Heritage Impact provides an assessment of the potential impacts if the proposal is approved and recommends mitigation measures to reduce the level of heritage impact.

### Overview of findings

This Statement of Heritage Impact has been prepared in accordance with the requirements and guidelines set out in the *Airports Act 1996* (Commonwealth), *Environment Protection and Biodiversity Conservation Act 1999* (Commonwealth), *Environment Protection and Biodiversity Conservation Regulations*, *Environmental Planning & Assessment Act 1979* (NSW) and *The Burra Charter* (ICOMOS, 2013).

The report concludes that:

- The study area is located within Bankstown Airport, a Commonwealth-owned site. The study area is within the central portion of the airport that is designated as the 'Aviation Zone' (Area 2) in the Bankstown Airport Master Plan 2019.
- The study area is located within, or in the vicinity of, two listed heritage items of local and Commonwealth significance:
  - Bankstown Aerodrome (Bankstown Local Environmental Plan 2015 Item No. I18)
  - Bankstown Airport Air Traffic Control Tower (Commonwealth Heritage List Place ID #106118)
- The study area is not subject to statutory or non-statutory heritage protections
- Although the study area is located in the vicinity of the Chevron Precinct at Bankstown Airport, a highly significant zone comprising World War II era hangars, auxiliary buildings and non-structural elements classified variously as being of 'high' and 'moderate' significance, the study area itself has not been identified to be located within an area of Heritage and Environmental Significance under the Bankstown Airport Heritage Management Plan
- The proposal is envisaged to strengthen Bankstown Airport's position as a regional airport offering training, maintenance and personal aviation through enhanced facilities
- As part of this report, the proposal has been assessed as having **neutral direct** and **negligible indirect** impacts to the Commonwealth Heritage Place, due to the works being located a substantial distance away
- As part of this report, the proposal has been assessed as aligning with the Bankstown Airport Heritage Management Plan policies and has recommended mitigation measures to further align with the policies
- As part of this report, the proposal has been assessed as having the following potential impacts to heritage:
  - The proposal would have a **neutral** direct (physical) impact to the Bankstown Air Traffic Control Tower No. 2 (Commonwealth Heritage List Place ID #106118) heritage item, as the structure would not be physically altered by the proposal
  - The proposal would have a **negligible** indirect (visual) impact to the Bankstown Air Traffic Control Tower No. 2 (Commonwealth Heritage List Place ID #106118) heritage item, as the wider setting and visual catchment of the item would be altered
  - The proposal would have a **negligible** direct (physical) impact to the Bankstown Aerodrome (Bankstown Local Environmental Plan Item No. I18) heritage item, as the significant WWII structures within the item would not be physically altered by the proposal
- The proposal would have a **minor adverse** indirect (visual) impact to the Bankstown Aerodrome (Bankstown Local Environmental Plan Item No. I18) heritage item, altering the overall visual character of the item and modifying a key visual identifier of the airport from the ground and the air. The recommendations listed below would assist in mitigating the above heritage impacts to the Bankstown Aerodrome item

## Approval pathways

The proposed works would not require referral under the EPBC Act.

Bankstown Airport, as a privately-leased Commonwealth airport, is subject to the planning frameworks set out in the *Airports Act 1996* and associated *Airports (Environment Protection) Regulations 1997*. Under Part 5 of the Act, the Commonwealth retains responsibility for land use, planning and the regulation of building activities on Commonwealth-leased airports.<sup>1</sup> Part 5 stipulates that each airport must have a final Master Plan outlining planning controls with Major Development Plans required for major airport developments, including any that affect an area identified as 'environmentally significant'.<sup>2</sup> This control includes items of heritage significance.

State and local government planning instruments do not apply to Commonwealth land; however, the Act requires the Master Plan for each airport to demonstrate consistency with these planning schemes. As such, this Statement of Heritage Impact will be prepared to meet the requirements of the NSW *Heritage Act 1977* where relevant. This Statement of Heritage Impact will form part of the Master Plan documentation to demonstrate consistency with the State and local planning schemes.

## Recommended mitigation measures

The following mitigation measures should be considered:

- Prior to construction, the Aviation Hangar Project locality should be formally documented in situ via photographic archival recording according to the (former) NSW Heritage Office guidelines for *Photographic Recording of Heritage Items Using Film or Digital Capture*.

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<sup>1</sup> Commonwealth Legislation, 2016. *Airports Act 1996*, No. 42.

<sup>2</sup> *Bankstown Airport Master Plan*, 2019. Report prepared for Bankstown Airport Limited, 110.

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## 1.0 INTRODUCTION

### 1.1 Project background

Aeria Management Group (formerly Sydney Metro Airports) are proposing development options on the terminal-tarmac intersection at Bankstown Airport. The proposal aims to strengthen Bankstown Airport's position as a regional airport offering training, maintenance, and personal aviation, whilst ensuring that the evolving needs of tenants are met. The proposal seeks to overhaul the existing buildings, taxiways, and aircraft hangars to improve both airside and landside operations, as well as improve employee and pedestrian access and safety. The proposed works include the construction of:

- Seven aircraft hangars. Three hangar types would be constructed, ranging from 24m to 34m in width, with a height of around 13.5m. Total hangars would occupy an area of around 7,800m<sup>2</sup>
- Administration/office facilities (ancillary support zone), occupying an area of around 1,500m<sup>2</sup>
- Carparking, including 66 car spaces
- Landscaping, including plantings and on-site detention features

Bankstown Airport is located on Commonwealth land, leased to Bankstown Airport Proprietary Limited on a long-term lease. Bankstown Airport is located on Commonwealth land, leased to Bankstown Airport Proprietary Limited on a long-term lease. There are no formal heritage protections which are associated with the Chevron Precinct, which is located adjacent to the east of the study area. Bankstown Airport is however listed as 'Bankstown Aerodrome' on the Bankstown Local Environmental Plan 2015 (Item no. I18). The 1970s Air Traffic Control Tower is listed on the Commonwealth Heritage List (Place ID #106118), although this site is beyond the study area, located approximately 650m south-west of the study area.

As part of the development options for Bankstown Airport, an area called the Aviation Hangar Project in the northern portion of the airport, between the runways and aircraft hangars, is being explored for redevelopment. Artefact Heritage have been engaged by Aeria Management Group to prepare a Statement of Heritage Impact (SoHI) for the Bankstown Airport Aviation Hangar Project.

This SoHI identifies the relevant statutory and regulatory contexts for the proposal and provides a detailed assessment of the historical and heritage context of the Bankstown Airport Aviation Hangar Project. The SoHI provides an assessment of the potential impacts and recommends mitigation measures to reduce the level of heritage impact.

### 1.2 Study area

Bankstown Airport is located 26km southwest of the Sydney Central Business District, between the suburbs of Georges Hall and Bankstown in the Canterbury-Bankstown Local Government Area (LGA). The airport is however, located on Commonwealth land, and therefore the Canterbury-Bankstown LGA has no municipal jurisdiction.

The airport is 313 hectares bound by Marion Street to the north, Wacker Street, Birch Street and Nancy Ellis Leebold Drive to the east, Milperra Road to the south and the Georges River and Georges River Golf Club to the west.

The Aviation Hangar Project is located in the northern portion of the airport, bound by Taxiway K to the northeast, Taxiway A to the southwest, Taxiway C to the west and Taxiway A4 to the east. The location of the study area is shown in Figure 1 below.

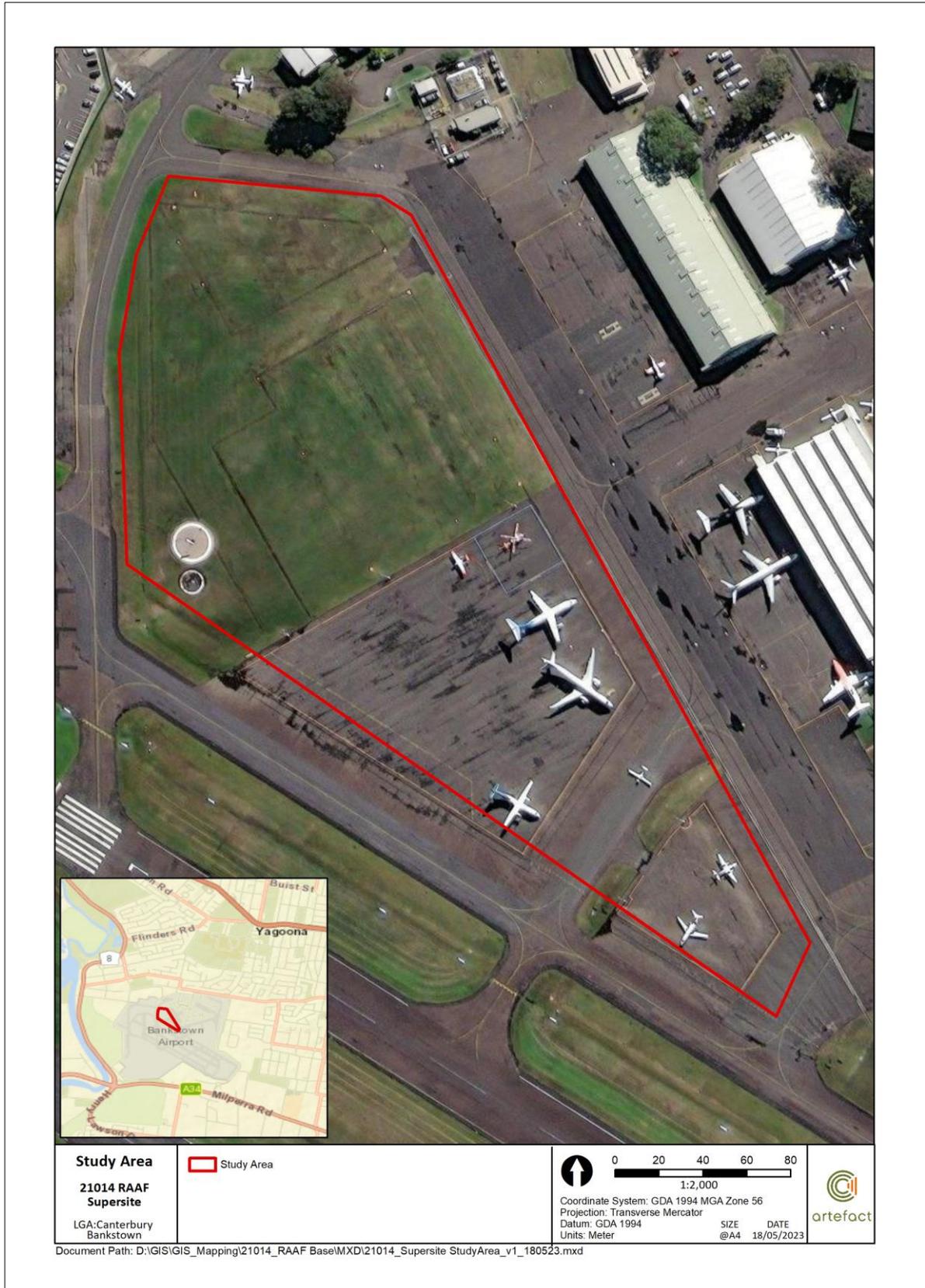


Figure 1: Aviation Hangar Project study area within Bankstown Airport

### 1.3 Authorship and acknowledgement

This report has been prepared by Katherine Chalmers (Heritage Consultant, Artefact Heritage), Charlotte Simons (Senior Associate, Artefact Heritage) and Sarah-Jane Zammit (Senior Associate, Artefact Heritage), with technical review by Anita Yousif (Technical Director, Artefact Heritage).

### 1.4 Limitations and constraints

This report is limited to assessment of the non-Aboriginal (historical) built heritage of the site. This report does not include investigation of the Aboriginal cultural heritage values of the site, or any non-Aboriginal (historical) archaeological potential.

Due to limitations regarding airside access, the site inspection by Artefact Heritage staff was limited to vehicular access and photographs were subsequently taken from the vehicle.

## 2.0 LEGISLATIVE CONTEXT

### 2.1 Introduction

This section outlines the methodology utilised in this SoHI to identify and assess items of heritage significance in and around the study area.

### 2.2 Identification of heritage listed items

Heritage listed items were identified through a search of relevant state and federal statutory and non-statutory heritage registers:

- World Heritage List (WHL)
- Commonwealth Heritage List (CHL)
- National Heritage List (NHL)
- State Heritage Register (SHR)
- Section 170 Heritage and Conservation Registers
- NSW State Heritage Inventory database
- Bankstown Local Environmental Plan (LEP) (2015)
- Register of the National Estate (RNE)
- National Trust of Australia (NSW) register.

Items listed on these registers have been previously assessed against the Commonwealth or NSW Heritage Assessment guidelines. Assessments of heritage significance as they appear in relevant heritage inventory sheets and documents, are provided in this assessment.

There are several items of legislation that are relevant to the current study area. A summary of the relevant Acts and the potential legislative implications are provided below.

### 2.3 Environmental Protection and Biodiversity Conservation Act 1999

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) provides a legislative framework for the protection and management of matters of national environmental significance, that is, flora, fauna, ecological communities and heritage places of national and international importance. Heritage items are protected through their inscription on the WHL, CHL or the NHL. A Heritage Management Plan (HMP) is required by Section 341S of the EPBC Act for places inscribed on the CHL.

The EPBC act stipulates that a person who has proposed an action that will, or is likely to, have a significant impact on a World, National or Commonwealth Heritage site must refer the action to the Minister for Sustainability, Environment, Water, Population and Communities (hereafter Minister). The Minister will then determine if the action requires approval under the EPBC Act. If approval is required, an environmental assessment would need to be prepared. The Minister would approve or decline the action based on this assessment. An action would also require approval if:

- It is undertaken on Commonwealth land and would have or is likely to have a significant impact on the environment on Commonwealth land; or
- It is undertaken by the commonwealth and would have or is likely to have a significant impact.

The term 'environment' here relates to environmental matters that are not necessarily formally listed, including the 'heritage values of places'.<sup>3</sup>

### 2.3.1 Commonwealth Heritage List

The Commonwealth Heritage List (CHL) has been established to list places of outstanding heritage significance to Australia. Established under the EPBC Act, the CHL comprises natural, Indigenous and historic heritage places on Commonwealth lands and waters or under Australian Government control.

There is **1 item** listed on the Commonwealth Heritage List within the Bankstown Airport Precinct:

- Bankstown Airport Air Traffic Control Tower (Place ID #106118). This item is located approximately 650m to the southwest of the study area.

## 2.4 Environment Protection and Biodiversity Conservation Regulations 2000

The *Environment Protection and Biodiversity Conservation Regulations* (EPBC Regulations) provide legislative requirements for the identification, assessment and management of National and Commonwealth heritage items.

Division 10.5 'Managing Commonwealth Heritage places' sets out the criteria for inclusion on the CHL and outlines the values of Commonwealth Heritage items and principles for their management, including the requirement for a management plan. Schedule 7A of the EPBC Regulations specifies the content of a management plan required for Commonwealth Heritage places.

### 2.4.1 Bankstown Airport Heritage Management Plan

A Heritage Management Plan (HMP) for Bankstown Airport was prepared by AECOM in 2018 as part of BAL's recognition of the heritage significance of Bankstown Airport, where BAL committed to managing the site in accordance with the Commonwealth heritage management principles of the EPBC Act and EPBC Regulations.<sup>4</sup> The 2018 HMP complements and updates the Heritage Management Strategy prepared by Godden Mackay Logan in 2005 and a HMP completed by Dawbin Architects in 2016.

The 2018 HMP divided Bankstown Airport into three operational areas, the Aviation Hangar Project is within Area 2, which encompasses the three parallel runways, associated taxiways, and hangars on the southern boundary of the airport, which have been assessed as not being of heritage significance. Area 2 does include the Commonwealth Heritage Listed Air Traffic Control Tower (Place ID. 106118), however a separate HMP was prepared for the site by Lovell Chen in 2017, and it is approximately 650 m to the southwest of the study area. The only feature within the study area the HMP identified was the 'Views Corridors across the site: open space of Area 2 (runways) and views and vistas across Areas 1, 2 and 3'. However, this feature was assessed as being of little significance and does not contribute to an historical understanding of the site.<sup>5</sup>

<sup>3</sup> AECOM, 2018. Bankstown Airport Masterplan – Bankstown Airport Heritage Management Plan. Report prepared for Bankstown Airport Limited.

<sup>4</sup> Bankstown Airport Master Plan, 212.

<sup>5</sup> AECOM, 2018. Bankstown Airport Masterplan – Bankstown Airport Heritage Management Plan. Report prepared for Bankstown Airport Limited.

## 2.5 Airports Act 1996

Bankstown Airport, as a privately-leased Commonwealth airport, is subject to the planning frameworks set out in the *Airports Act 1996* and associated *Airports (Environment Protection) Regulations 1997*. Under Part 5 of the Act, the Commonwealth retains responsibility for land use, planning and the regulation of building activities on Commonwealth-leased airports.<sup>6</sup> Part 5 stipulates that each airport must have a final Master Plan outlining planning controls with Major Development Plans required for major airport developments, including any that affect an area identified as 'environmentally significant'.<sup>7</sup> This control includes items of heritage significance.

State and local government planning instruments do not apply to Commonwealth land; however, the Act requires the Master Plan for each airport to demonstrate consistency with these planning schemes.

### 2.5.1 Bankstown Airport Master Plan

The Bankstown Airport Master Plan is the framework used to guide all development at Bankstown Airport. The Master Plan was approved by the Minister for Infrastructure, Transport and Regional Development on 7 November 2019.

Section 8.0 of the Master Plan concerns land use planning at Bankstown Airport, with the study area located within the Aviation Zone, which encompasses runways, taxiways, aircraft parking and movement areas, containing the principal aviation activities of Bankstown Airport.<sup>8</sup> The objectives of the Aviation Zone are to ensure the area accommodates safe and efficient aircraft movement and contains facilities for aircraft navigation, communication and maintenance.<sup>9</sup> Future development of the area will focus on addressing aviation needs, and enhance ancillary and other support infrastructure to improve airside operation.

Section 12.4.2 of the Master Plan outlines heritage management and principles at Bankstown Airport, indicating the Airport Control Tower and the Chevron Precinct as the main areas of heritage/environmental significance at the site.<sup>10</sup> The Master Plan identifies activities and potential heritage impacts associated with the development of Bankstown Airport, as shown in Table 1.

**Table 1: Bankstown Airport Master Plan - Activities and Associated Heritage Impacts**

Activity	Potential impact
Modifications to non-Indigenous heritage items	Damage to historic fabric Loss of heritage value
Construction works impacting Indigenous and non-Indigenous heritage items	Damage to unexpected heritage artefact Loss of heritage value (e.g. impacts on sightlines)

## 2.6 Environmental Planning and Assessment Act 1979 (NSW)

The *Environmental Planning and Assessment Act 1979* (NSW) (EP&A Act) establishes the framework for cultural heritage values to be formally assessed in the land use planning and

<sup>6</sup> Commonwealth Legislation, 2016. *Airports Act 1996*, No. 42.

<sup>7</sup> *Bankstown Airport Master Plan*, 2019. Report prepared for Bankstown Airport Limited, 110.

<sup>8</sup> *Bankstown Airport Master Plan*, 110.

<sup>9</sup> *Bankstown Airport Master Plan*, 126.

<sup>10</sup> *Bankstown Airport Master Plan*, 213.

development consent process. The EP&A Act requires that environmental impacts are considered prior to land development; this includes impacts on cultural heritage items and places as well as archaeological sites and deposits. The EP&A Act requires that Local Governments prepare planning instruments (LEPs and Development Control Plans [DCPs]) in accordance with the Act, to provide guidance on the level of environmental assessment required.

### 2.6.1 Bankstown Local Environmental Plan 2015

Heritage items listed on the Bankstown LEP 2015 are managed in accordance with the provisions of Section 5.10 Heritage Conservation of this LEP. Under Clause 5 of this section of the Bankstown LEP 2015:

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*The consent authority may, before granting consent to any development:*

*(a) on land on which a heritage item is located, or*

*(b) on land that is within a heritage conservation area, or*

*(c) on land that is within the vicinity of land referred to in paragraph (a) or (b),*

*require a heritage management document to be prepared that assesses the extent to which the carrying out of the proposed development would affect the heritage significance of the heritage item or heritage conservation area concerned.*

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The Bankstown Airport is listed as a locally significant item on Schedule 5 of the Bankstown LEP 2015 as the 'Bankstown Aerodrome' (Item No. 118). The study area falls within the boundaries of the Canterbury-Bankstown LGA, although as it is located on Commonwealth land it is not part of the municipal jurisdiction.

## 2.7 Non-statutory registers

### 2.7.1 Register of the National Estate

The Register of the National Estate (RNE) is a list of natural, Aboriginal, and historic heritage places throughout Australia. It was originally established under the Australian Heritage Commission Act 1975. Under that Act, the Australian Heritage Commission entered more than 13,000 places in the register. Following amendments to the Australian Heritage Council Act 2003, the RNE was frozen on 19 February 2007 and ceased to be a statutory register in February 2012. The RNE is now maintained on a non-statutory basis as a publicly available archive and educational resource.

Bankstown Airport is included as an 'indicative place' on the RNE.

## 2.8 Summary of heritage listings

### 2.8.1 Aviation Hangar Project

The heritage listings associated with the Bankstown Airport Aviation Hangar Project are summarised in Table 2 below. The curtilages of these items are illustrated in the accompanied heritage items map (Figure 2).

**Table 2: Results of register searches for the Bankstown Airport Aviation Hangar Project and adjacent heritage items**

Register	Bankstown Airport Aviation Hangar Project	Other items
<b>World Heritage List</b>	None	None
<b>National Heritage List</b>	None	None
<b>Commonwealth Heritage List</b>	None	Air Traffic Control Tower no.2 (Place ID #106118)
<b>State Heritage Register</b>	None	None
<b>Section 170 Registers (NSW Transport Asset Holding Entity [formerly RailCorp] s170)</b>	None	None
<b>Bankstown LEP 2015</b>	Bankstown Aerodrome (Item no. 118)	None
<b>Register of the National Estate (RNE) (Non-Statutory)</b>	Bankstown Airport (Indicative Place) (Place ID. 103900)	None
<b>National Trust of Australia (NT) NSW Register (Non-Statutory)</b>	None	None



Figure 2: Heritage items map

## 3.0 HISTORICAL BACKGROUND

### 3.1 Aboriginal history

Aboriginal people have cared for Country for tens of thousands of years, harnessing the rich resources of the landscape through land management practices that were based on a profound respect for the environment. The land and waterways upon which Bankstown Airport itself is located is on the border of several Aboriginal language groups, being located on Bediagal/Bidjigal and Cabrogal/Gabrogal Country. The territory of the Bediagal encompasses the land between the Cooks River and Georges River, extending west as far as Prospect and east to Botany Bay.<sup>11</sup> The territory of the Cabrogal encompasses the land around Georges River between what is now Liverpool, Fairfield, and Cabramatta.

Georges River and its associated tributaries were effective means of movement within the landscape, with the bark from the surrounding forest being used to create 'nawi' (canoes). The region had plentiful land and water resources and Aboriginal people were highly effective hunter gatherers, developing techniques such as firestick farming which was used to draw out animals such as kangaroo and possums, as well as encourage new plant growth. The river and its creeks, including Salt Pan Creek, Cabramatta Creek, Prospect Creek, and Orphan School Creek, remain as important features of Country.

Interactions between the Aboriginal people and early European settlers began as colonists were sent south of Sydney to find wandering cattle. From 1798 to the 1810s settlement had expanded across the area with land being granted to colonists at Bankstown and Cabramatta. As was the case right across the Sydney region, Aboriginal people were faced with the choice of accepting the colonisers and trying to work with them or fighting back. The rugged reaches of Tucoerah (or Tuggerah) (Georges River) offered a perfect base for fighting back.

Contact between Aboriginal People and European colonisers in the area was marred by violence. This was proven to be the case when Bediagal warrior Pemulwuy began to lead a significant resistance movement against the colonists in the 1790s. The conflict culminated in the Appin Massacre in 1816. In the following decades, Aboriginal people were continually displaced from their land, and many began to work for European settlers.

Along the Georges River throughout the late 19th century Aboriginal families were attempting to hold on to portions of their own land. They also kept up a broader community and wider family networks by moving around Country, in similar ways to how they had done pre-invasion. Salt Pan Creek, which is a tributary of the Georges River and in the wider landscape of the Bankstown area, was an important site of resistance of the Bediagal people during early colonial exploration.<sup>12</sup>

The impact of the Aborigines Protection Board from the 1880s cannot be understated. While some people managed to in effect 'hide' along the reaches of the Georges River, others were moved to agreed places such as La Perouse where they could be under the surveillance of the Board. Meanwhile, further down the river, Aboriginal families had managed to purchase several blocks of land at Salt Pan Creek and continued to allow other families to camp there and in the bush nearby. During the early decades of the 20th century, the camp at Salt Pan Creek was an important refuge and became the focus of Aboriginal activism.

From the 1960s the Aboriginal population in the area and right across Sydney began to grow. With changing government policies on restricting Aboriginal families and movement, many chose to move

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<sup>11</sup> Attenbrow, 2010: 27; Karskens, 2010: 394.

<sup>12</sup> Goodall and Cadzow, *Rivers and Resilience*, 2009, pp. 49-50

to the city for work. While many went to the Aboriginal 'hub' at Redfern, some moved into assisted housing in south and western Sydney. New attachments to the rivers, creeks and remaining bushland in the Georges River areas were formed,<sup>13</sup> which remain strong to this day.

## 3.2 Non-Aboriginal history

### 3.2.1 Early land grants and use

European exploration of the Bankstown area commenced in 1795 when Matthew Flinders and George Bass navigated the Georges River. The village of Bankstown was established in 1798 following a visit by Governor Hunter, who named the town 'Banks Town' in honour of Sir Joseph Banks (1743-1820), the botanist who travelled with Captain James Cook.<sup>14</sup> Soon after Bass and Flinders' exploration, land in the area began to be granted to various colonists. The first grant in the area was 100 acres given to Bass in 1798, with Flinders receiving 300 acres as well. Neither farmed their land and it was soon acquired by the Crown. By 1799, 1200 acres of land had been allocated to soldiers, marines and ex-convicts.<sup>15</sup> According to maps of the Parish of Bankstown, by 1843 allotments in the area of Bankstown Airport had been obtained by Thomas Jamieson, George Johnston Junior, John Liquorice, Andrew Cunningham and J.L. Spencer (Figure 3).<sup>16</sup> Cunningham and Liquorice had obtained their properties by 1826 at the latest.<sup>17</sup> George Johnston Junior received his first land grant in Bankstown in 1804 from Governor King and additional land in 1819. Johnston and his father, George Johnston Senior, who owned land north of his sons upon which he built still extant Georges Hall Homestead, reared cattle upon their land supplying the government with meat. Most land use in the area was dedicated to livestock, likely due to the poorer quality soil compared to Parramatta.<sup>18</sup>

Development of the area throughout the nineteenth century was slow. As indicated in the 1843 Parish of Bankstown map, the land on which the Aviation Hangar Project is located was unclaimed, however between 1847 and 1855, the land was acquired by James Pennington and he retained ownership of this property until at least 1918 (Figure 3 and Figure 4).<sup>19</sup> The coming of the railway to Bankstown in 1909 stimulated some population growth, largely clustered around the town centre and the railway station, with the land to the west remaining predominantly farming land, some of which were dairies, poultry farm or market gardens.<sup>20</sup>

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<sup>13</sup> In the early 1990s, Jim Kohen estimated that there were 20,000 descendants of Sydney Aboriginal people in the wider Sydney region and beyond. Kohen, *Daruganora*, p. 2

<sup>14</sup> AECOM, *Bankstown Airport Heritage Management Plan*, 2018

<sup>15</sup> Pollon, Frances, 1996. *The Book of Sydney Suburbs*, Harper Collins Publisher: Sydney, pg. 19.

<sup>16</sup> 'Bankstown [cartographic material] [bordered by Parish of Liberty Plains]', State Library of NSW, <https://collection.sl.nsw.gov.au/record/74VvOleJ7ZrO>

<sup>17</sup> *Grant Index, 1792-1826*, <https://htrv.nswlrs.com.au/>

<sup>18</sup> A.T. Yarwood, 'George Johnston (1790-1820)', Australian Dictionary of Biography, <https://adb.anu.edu.au/biography/johnston-george-2278>; A.T. Yarwood, 'George Johnston (1764-1823)', Australina Dictionary of Biography, <https://adb.anu.edu.au/biography/johnston-george-2277>; and AECOM, *Bankstown Airport Heritage Management Plan*, 2018.

<sup>19</sup> 'Bankstown [cartographic material] [bordered by Parish of Liberty Plains]', State Library of NSW, <https://collection.sl.nsw.gov.au/record/74VvOleJ7ZrO>; and '[Parishes of Bankstown and Holsworthy] [cartographic material]', State Library of NSW, <https://collection.sl.nsw.gov.au/record/74Vv5y5LZ4K3>.

<sup>20</sup> AECOM, *Bankstown Airport Heritage Management Plan*, 2018.

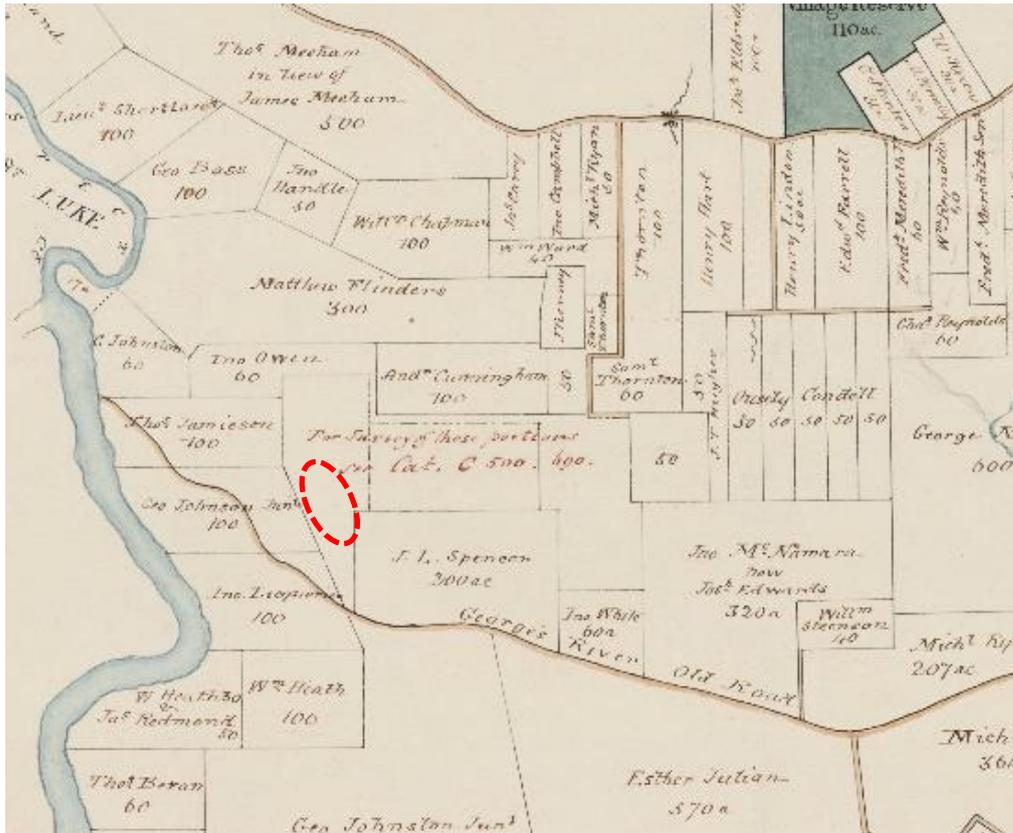


Figure 3: Parish of Bankstown land grants 1843. Source: State Library of NSW

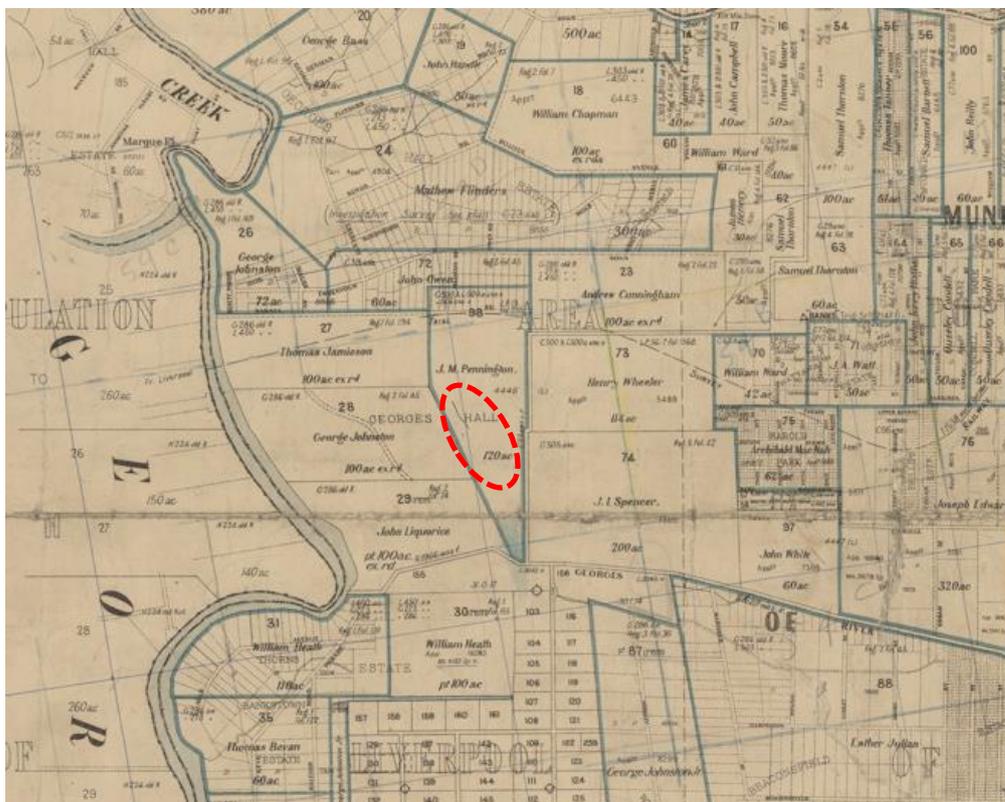


Figure 4: Parish map of Bankstown 1918. Source: State Library of NSW<sup>21</sup>

<sup>21</sup> <https://collection.sl.nsw.gov.au/record/74VvLE3WpJy>

### 3.2.2 Bankstown Airport

#### 3.2.2.1 World War II military operations (1940–45)

Following the commencement of WWII in 1939, Bankstown airfield was established as Sydney's second aerodrome and the base for the Royal Australian Air Force (RAAF) and the Women's Australian Auxiliary Air Force (WAAAF).<sup>22</sup> The aerodrome was originally known as No. 2 Aircraft Park, following the establishment of No. 1 Aircraft Park at Laverton in May 1940. Aircraft parks, as they were known, were intended as assembly and storage facilities for military aircraft prior to their dispatch to squadron units. Bankstown aerodrome was intended to supply aircraft to operational airfields and flying/training schools around New South Wales and had a close association with the Empire Air Training Scheme (EATS), a training scheme that recruited aircrew from around the British Empire.<sup>23</sup>

The Bankstown site was acquired for £60,000 under the *National Security Act* of June 1940; by 12 January 1941, the first aircraft had arrived for assembly.<sup>24</sup> These aircraft included Avro Ansons and Airspeed Oxfords. The first hangar, a Bellman type (Hangar 15), was erected alongside these first aircraft, with the hangar assembly completed in twenty days.<sup>25</sup> Dismantled aircraft were delivered to the site from the United States (US) or the United Kingdom (UK) and painstakingly assembled at Bankstown within large-scale, portable hangars.

Initially intended as a training facility, the airfield was given operational status in early 1941 due to fears of a Japanese invasion.<sup>26</sup> A total of 22 RAAF units were associated with Bankstown throughout the war, including Squadron 451, No 101 Fighter Control Unit and No 453 Fighter Squadron.<sup>27</sup> Following the Japanese attacks on American, British, and Dutch forces in December 1941, Bankstown airfield became a major military base in the Australian defence campaign. The aerodrome was able to be easily identified from the air due to its 'chevron' layout and was consequently vulnerable.<sup>28</sup> This susceptibility was reflected in the six anti-aircraft guns positioned around the perimeter of the airfield to defend against enemy attack.<sup>29</sup> The aircraft manufacturing company de Havilland established its own aircraft assembly plant at the airport during 1942, with the first Australian-built de Havilland Mosquito aircraft completed in July 1943.<sup>30</sup>

In April 1942, the US Army Air Force (USAAF) arrived at Bankstown and assisted in the erection of a new hangar known as the 'American' or 'US Hangar', with units including the 41<sup>st</sup> Fighter Squadron, and the 35<sup>th</sup> and 49<sup>th</sup> Fighter Wings training at the site.<sup>31</sup> By this time, Bankstown airfield was an impressive complex, with repair and assembly facilities, extensive fuel storage and accommodation for 700 officers. American officers returned to Bankstown for billeting, with their association to Bankstown airfield leading to the area being playfully dubbed 'Yankstown'. The USAAF left Bankstown in 1944.

On the 11 November 1944, Bankstown Aerodrome was officially commissioned as a Mobile Naval Operating Air Base (MONAB) for the Royal Navy Fleet Air Arm. In January 1945, the Royal Navy

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<sup>22</sup> *Bankstown Airport Master Plan*, 18.

<sup>23</sup> Ainsworth Heritage, 2007. *Evans Head Memorial Aerodrome: Bellman Hangar Conservation Management Plan*. Report prepared for Richmond Valley Council. 24.

<sup>24</sup> White, K, 2001. 'Brief history of RAAF Station, Bankstown NSW'. Australian Aviation Museum, Bankstown.

<sup>25</sup> Matts, C., Lockley, T. 2009. 'Bankstown Airport: Notes for a Heritage Assessment'. Australian Aviation Museum, Bankstown.

<sup>26</sup> NSW Office of Environment and Heritage (former), 2001. 'Bankstown Aerodrome'. Accessed online 22 February 2021 at: <https://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?id=1060175>

<sup>27</sup> Ibid.

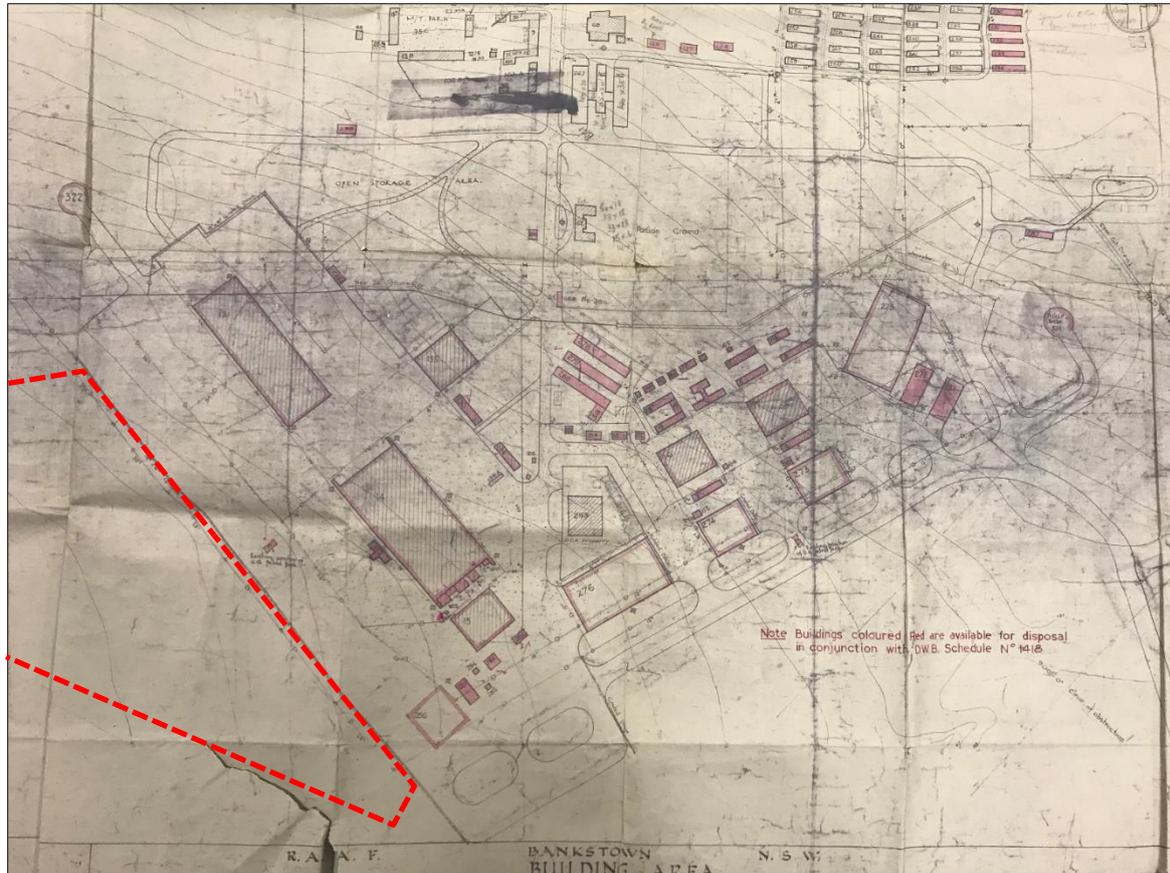
<sup>28</sup> Claoue-Long, Anne. 2015. *RAAF Bases Thematic Study: Report Prepared for the Department of Defence*. Redfern: GML Heritage, 23.

<sup>29</sup> Claoue-Long, *RAAF Bases Thematic Study*, 23.

<sup>30</sup> NSW Office of Environment and Heritage, 'Bankstown Aerodrome'.

<sup>31</sup> NSW Office of Environment and Heritage, 'Bankstown Aerodrome'.

Fleet Air Arm took control of the MONAB, which was named HMS *Nabberley*.<sup>32</sup> The Royal Navy used the MONAB to store, repair and assemble aircraft including Avengers, Corsairs, Expeditors, Hellcats, Martinets, Reliants, Sea Fires, Sea Otters and Fairey Fireflies.<sup>33</sup> Following the conclusion of WWII, the Royal Navy departed Bankstown with the withdrawal of the British Pacific Fleet from Australia in 1946.



**Figure 5. Map of building area at Bankstown Airport, dated 9 March 1945. Outline of proposed study area in red. Source: National Archives of Australia, SP857/10, 1045828**

### 3.2.2.2 Post-war aviation

Following the conclusion of WWII in 1945, a migrant camp was established at the airfield to house workers.<sup>34</sup> The camp ran from 1949–52. At the same time, the remainder of the Bankstown airfield was taken over by the Department of Civil Aviation and significantly improved. The first paved runway was constructed in 1952 for the introduction of newer jet fighters assembled onsite.<sup>35</sup> Further construction of runways and cross-runways followed in the 1960s and 1970s. These developments formalised Bankstown into a civil airport, with the site established as the largest general aviation airport in the Southern Hemisphere.<sup>36</sup> To reflect this upgrade, a new control tower was commissioned in 1970.<sup>37</sup>

<sup>32</sup> Royal Navy Research Archive, n.d. Fleet Air Arm Bases – RNAS Bankstown. Accessed online 11 May 2021 at: <http://www.royalnavyresearcharchive.org.uk/FAA-Bases/Bankstown.htm#.YJn32bUzY2w>

<sup>33</sup> Boyd, Noni, Terry Kass, and Scott Robertson. 2006. *World Wars 1 & 2 Survey of Buildings, Sites & Cultural Landscapes in NSW. Final Report, Volume 1*. Naremburn: Robertson & Hindmarsh, 185.

<sup>34</sup> *Bankstown Airport Master Plan*, 18.

<sup>35</sup> Rosen, Sue. 1987. 'What's Under the Hill', *Bankstown Historical Society Journal*, Vol 21 No. 3.

<sup>36</sup> *Bankstown Airport Master Plan*, 18.

<sup>37</sup> NSW Office of Environment and Heritage, 'Bankstown Aerodrome'.

In 1988, Bankstown Airport was operated by the Federal Airports Corporation (FAC).<sup>38</sup> The Australian Aviation Museum opened in the southern section of the airport in 1994. The museum featured a non-local Bellman hangar, which had been sourced from a storage facility at Hoxton Park. The museum closed in 2018 and the hangar was removed. A decade after its acquisition by the FAC, Bankstown Airport was privatised and transferred to the BAL in 1998.<sup>39</sup> The long-term lease of the airport, along with the BAL, was secured from the Commonwealth Government in 2003.<sup>40</sup> The BAL continues to manage the airport.

### 3.2.3 Aviation Hangar Project history

As evident in the aerial imagery dating from 1950s onwards, the area of the Bankstown Aviation Hangar Project has been cleared, flat land. Permanent taxiways delineating the exact area appear to have been introduced between 1960 and 1970. A tarmac plane parking zone was added in the middle portion of the site by the late 1990s. As indicated by the aerials, the Aviation Hangar Project has predominantly used for parking of light and propeller planes.



Figure 6. Bankstown Airport aerial 1950

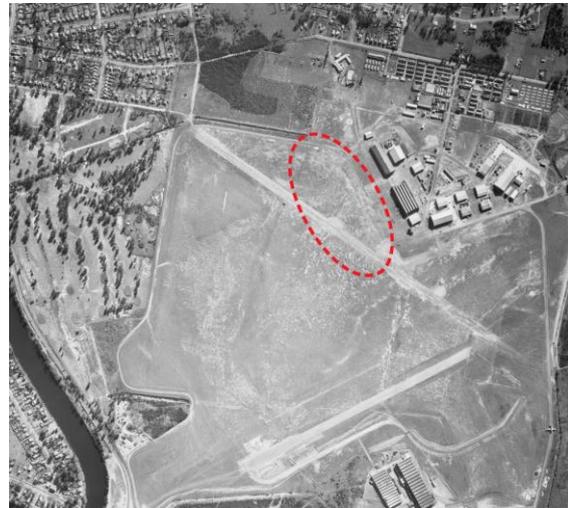


Figure 7. Bankstown Airport aerial 1960



Figure 8. Bankstown Airport aerial 1970



Figure 9. Bankstown airport aerial 1977

<sup>38</sup> *Bankstown Airport Master Plan*, 18.

<sup>39</sup> *Bankstown Airport Master Plan*, 18.

<sup>40</sup> *Bankstown Airport Master Plan*, 18.



Figure 10. Bankstown airport aerial 1985



Figure 11. Bankstown Airport aerial 1997



Figure 12. Bankstown Airport Aerial 2003

## 4.0 PHYSICAL CONTEXT

### 4.1 Site inspection

A site inspection of the Aviation Hangar Project was undertaken by Katherine Chalmers (Heritage Consultant, Artefact Heritage) and Charlotte Simons (Senior Associate, Artefact Heritage) on 6 March 2023.

The aim of the site inspection was to investigate the area slated for upgrade and the potential impacts of the proposal to the study area. Views and vistas around the study area were also recorded.

Due to restrictions limiting on foot access to the airside area of the airport, the site inspection was carried out from a car and supplemented by a photographic record.

#### 4.1.1 Bankstown Airport

The main access to the Airport is via Airport Avenue, which is the main North South axis road, however the airport can also be accessed from Nancy Ellis Leebold Drive, Wackett Street, Link Road, Drover Road, Tower Road, and Prentice Street.

The majority of the aviation and commercial facilities are organised in a distinct Chevron arrangement around a central axis, Airport Avenue. The hangars support a range of aircrafts including light planes, helicopters, and larger private charter jets. The Airport has three runways, intersected by a system of taxiways.



**Figure 13: Airport Avenue looking south (Source: Artefact, 2023)**



**Figure 14: View of B16, B274 and B276 from B16 (Source: Artefact, 2023)**



**Figure 15: View of timber auxiliary building - B66, B67 and B8 (Source: Artefact, 2023)**



**Figure 16: View of B16 (Source: Artefact, 2023)**

#### 4.1.2 Aviation Hangar Project precinct

The Aviation Hangar Project precinct is located in Area 2 as defined in the Bankstown Airport Heritage Management Plan. The site consists of a large open grassed area in the northern portion of the site and the southern portion is tarmacked and used for aircraft parking.



**Figure 17: View of the most south-eastern portion of the Aviation Hangar Project, looking southwest from intersection of Taxiway K and Taxiway L (Source: Artefact, 2023)**



**Figure 18: View of the middle-tarmacked aircraft parking zone within in the Aviation Hangar Project, looking northwest from Taxiway K (Source: Artefact, 2023)**



**Figure 19: Central tarmac area of the Super site, looking south (Source: Artefact, 2023)**



**Figure 20: Central aircraft parking space in Aviation Hangar Project, looking northwest from Taxiway K (Source: Artefact, 2023)**



**Figure 21: Southern extent of the grassed area of the Aviation Hangar Project, looking northwest from Taxiway K (Source: Artefact, 2023)**



**Figure 22: open grassed area of the Aviation Hangar Project, looking west from Taxiway K (Source: Artefact, 2023)**



**Figure 23: Southern extent of the open grassed portion of the Aviation Hangar Project, looking south west from Taxiway K (Source: Artefact, 2023)**



**Figure 24: Northern most portion of the Aviation Hangar Project, showing hangars on north side of the airport, looking north from Taxiway K (Source: Artefact, 2023)**



**Figure 25: view down the length of the Aviation Hangar Project, looking south-east from Taxiway K (Source: Artefact, 2023)**



**Figure 26: View of the northern most point of the Aviation Hangar Project, looking south from the intersection of Taxiway K and C (Source: Artefact, 2023)**



**Figure 27: View of the northern most open grassed section of the Aviation Hangar Project and the aircraft hangars beyond**



**Figure 28: View of the southern extent of the grassed area and the aircraft parking portion of the Aviation Hangar Project, from the intersection of Taxiway C and Taxiway A)**



**Figure 29: View of the windsock in the centre of the grassed area of the Aviation Hangar Project from Taxiway A (Source: Artefact, 2023)**



**Figure 30: View of the transition from tarmac to open grass area of the Aviation Hangar Project, looking northeast from Taxiway A (Source: Artefact, 2023)**



**Figure 31: Aircrafts parked in the tarmac aircraft parking portion of the Aviation Hangar Project with aircraft hangars in the background, looking east from Taxiway A (Source: Artefact, 2023)**



**Figure 32: View of the western extent of the Aviation Hangar Project from Taxiway A looking northwest (Source: Artefact, 2023)**

## 5.0 SIGNIFICANCE ASSESSMENT

### 5.1 Methodology

Determining the significance of heritage items or a potential archaeological resource is undertaken by utilising a system of assessment centred on the Australia ICOMOS Burra Charter, 2013. The principles of the charter are relevant to the assessment, conservation and management of sites and relics. The assessment criteria for both Commonwealth Heritage items and NSW local heritage items are outlined below to contextualise the assessment of significance and statements of significance for the listed items within the Bankstown Airport area. Details of each heritage item have been extracted from the Australian Heritage Database and the NSW State Heritage Inventory (SHI) database.

#### 5.1.1 Commonwealth heritage assessment criteria

The heritage significance of the Air Traffic Control Tower No. 2 is assessed under the Commonwealth Heritage List Criteria as required by the EPBC 1999. The criteria are outlined in Table 3.

Although the entirety of Bankstown Airport is not listed on the Commonwealth Heritage List, previous reports have assessed Bankstown Airport as meeting the threshold for listing and is therefore managing the site in accordance with Commonwealth Heritage Management principles. This includes using the Commonwealth Heritage List criteria be used to assess the significance of areas within the Airport.

**Table 3: Commonwealth Heritage List heritage assessment criteria**

Criteria	Description
<b>A – Commonwealth Heritage List</b>	The place has significant heritage value because of the place's importance in the course, or pattern, of Australia's natural or cultural history
<b>B – Commonwealth Heritage List</b>	The place has significant heritage value because of the place's possession of uncommon, rare or endangered aspects of Australia's natural or cultural history
<b>C – Commonwealth Heritage List</b>	The place has significant heritage value because of the place's potential to yield information that will contribute to an understanding of Australia's natural or cultural history
<b>D – Commonwealth Heritage List</b>	The place has significant heritage value because of the place's importance in demonstrating the principal characteristics of: <ul style="list-style-type: none"> <li>• a class of Australia's natural or cultural places; or</li> <li>• a class of Australia's natural or cultural environments</li> </ul>
<b>E – Commonwealth Heritage List</b>	The place has significant heritage values because of the place's importance in exhibiting particular aesthetic characteristics values by a community or cultural group
<b>F – Commonwealth Heritage List</b>	The place has significant heritage value because of the place's importance in demonstrating a high degree of creative or technical achievement at a particular period
<b>G – Commonwealth Heritage List</b>	The place has significant heritage value because of the place's strong or special association with a particular community or cultural group for social, cultural or spiritual reasons

Criteria	Description
<b>H – Commonwealth Heritage List</b>	The place has significant heritage value because of the place's special association with the life or works of a person, or group of persons, of importance in Australia's natural or cultural history
<b>I – Commonwealth Heritage List</b>	The place has significant heritage value because of the place's importance as part of Indigenous tradition

#### 5.1.1.1 Grading of heritage significance

The different elements of a structure or place contribute to its overall heritage value. The loss of one or more of these components may diminish the overall significance of the item. Specifying the contribution that a component makes to the overall heritage significance of a structure or place provides a useful framework for its management.

The Heritage Management Plan for Bankstown Airport outlines appropriate terminology and justification for grading individual components in line with the requirements of the Commonwealth Heritage List, and the implications that this grading has to an item or landscape's significance (Table 4).<sup>41</sup>

**Table 4: Standard grades of significance**

Grading	Justification	Status
<b>Exceptional (E)</b>	Element of outstanding/exceptional significance or heritage value – embodies Commonwealth Heritage values or State heritage significance in its own right and makes an irreplaceable contribution to the significance/heritage value of the place as a whole	National Heritage Value (likely to fulfil National and Commonwealth Heritage criteria)
<b>High (H)</b>	Element of high significance or heritage value – embodies Commonwealth Heritage values in its own right and makes an irreplaceable contribution to the significance/heritage value of the place as a whole	Commonwealth Heritage Value (likely to fulfil Commonwealth and State Heritage criteria)
<b>Moderate (M)</b>	Element of moderate significance or heritage value – embodies Commonwealth heritage values in its own right and makes a significant contribution to the values of the place as a whole	Commonwealth Heritage Value (likely to fulfil Commonwealth and State Heritage criteria)
<b>Little (L)</b>	Element of some significance that makes a contribution to the overall Commonwealth Heritage values of the place as a whole	Local Heritage value (likely to meet local heritage criteria)
<b>None (N)</b>	Element which is neutral, with little or no heritage value	Does not have Commonwealth, State or Local Heritage value on its own merit
<b>Intrusive (I)</b>	Intrusive element which detracts, or has the potential to detract, from the significance of the place	Does not have heritage value

<sup>41</sup> Godden Mackay Logan, 2009 in AECOM, 2018. Bankstown Airport Masterplan – Bankstown Airport Heritage Management Plan. Report prepared for Bankstown Airport Limited.

### 5.1.2 NSW heritage assessment criteria

The assessment of heritage significance is outlined through legislation in the *Heritage Act 1977* (NSW) (the Heritage Act) and implemented through the *NSW Heritage Manual* and *Assessing Heritage Significance* guidelines.<sup>42</sup>

If an item meets one of the seven heritage criteria and retains the integrity of its key attributes, it can be considered to have heritage significance (refer to Table 5). The significance of an item or potential archaeological site can then be assessed as being of local or State significance. If a potential archaeological resource does not reach the local or state significance threshold, then it is not classified as a ‘relic’ under the Heritage Act.

‘*State heritage significance*’, in relation to a place, building, work, relic, moveable object or precinct, means significance to the State in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item.<sup>43</sup>

‘*Local heritage significance*’, in relation to a place, building, work, relic, moveable object or precinct, means significance to an area in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item.<sup>44</sup>

**Table 5: NSW heritage assessment criteria**

Criteria	Description
<b>A – Historical Significance</b>	An item is important in the course or pattern of the local area’s cultural or natural history.
<b>B – Associative Significance</b>	An item has strong or special associations with the life or works of a person, or group of persons, of importance in the local area’s cultural or natural history.
<b>C – Aesthetic or Technical Significance</b>	An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the local area.
<b>D – Social Significance</b>	An item has strong or special association with a particular community or cultural group in the local area for social, cultural or spiritual reasons.
<b>E – Research Potential</b>	An item has potential to yield information that will contribute to an understanding of the local area’s cultural or natural history.
<b>F – Rarity</b>	An item possesses uncommon, rare or endangered aspects of the local area’s cultural or natural history.
<b>G - Representativeness</b>	An item is important in demonstrating the principal characteristics of a class of NSW’s cultural or natural places of cultural or natural environments (or the cultural or natural history of the local area).

## 5.2 Existing heritage assessments

### 5.2.1 Bankstown Air Traffic Control Tower No. 2 (CHL Place ID #106118)

#### 5.2.1.1 Description

*The ATC tower, powerhouse and equipment room are located to the west of the airport. The complex is enclosed in a fence of cyclone and barbed wire, with a pedestrian entry to the north-west of the*

<sup>42</sup> NSW Heritage Office and Department of Urban Affairs & Planning, 1996; Department of Planning, Industry & Environment and Heritage Council of NSW, 2022.

<sup>43</sup> Department of Planning Heritage Branch, 2009: 6.

<sup>44</sup> Ibid.

enclosure. Additions to the complex since the late-1960s include a single-storey, skillion-roofed extension that abuts the west end of the tower's south elevation (this building is not part of the ATC facility), and a satellite dish enclosure to the east, built in 1992. The floor of the cabin is 15m above ground level.<sup>45</sup>

Bankstown ATC tower is composed of a square four-storey reinforced concrete base with face brick cladding, below a rectangular cantilevered walkway, also in reinforced concrete, around an octagonal cabin. The cabin is raised on a part-chamfered half-height duct and service space and octagonal cabin.<sup>46</sup>

The tower is built on standard raft footings, with a central stair in reinforced concrete. A single-storey brick wing (radio equipment room) extends westward from the tower base and a powerhouse is located a short distance to the north. Both are original components of the ATC complex and appear to be intact externally.<sup>47</sup>

### 5.2.1.2 Assessment of significance

The Commonwealth assessment of significance for the Bankstown Air Traffic Control Tower No. 2 item, as assessed in the associated HMP, is as follows:<sup>48</sup>

**Table 6: Heritage assessment for Bankstown Air Traffic Control Tower No.2**

Criteria	Description
<b>A – Commonwealth Heritage List</b>	Bankstown ATC tower no. 2 is of historical interest as a late, and largely intact example, of the service block surmounted by control cabin type ATC tower that was constructed at airports across Australia in the 1950s and 1960s. It was part of the DCA's ongoing efforts to standardise such facilities and improve air safety. The Bankstown tower was built at the end of the 1960s, a time of significant investment and development at Bankstown Airport and is of some limited historical interest in this context.
<b>B – Commonwealth Heritage List</b>	While it is one of a relatively limited number of 1960s ATC towers of various forms surviving around Australia, the Bankstown ATC tower is not considered to be 'uncommon' or 'rare' at a level indicative of Commonwealth heritage value.
<b>C – Commonwealth Heritage List</b>	No evidence to indicate that Bankstown ATC tower no. 2 has the potential to yield information that will contribute to an understanding of Australia's natural or cultural history came to light during research for this HMP.
<b>D – Commonwealth Heritage List</b>	Bankstown ATC tower no. 2 is a representative and substantially intact example of a standardised ATC tower dating from the first phase of post-World War II design in air traffic control facilities (1950s to late 1960s). The tower was designed by the Commonwealth of Australia Department of Works (NSW branch) for the DCA.
<b>E – Commonwealth Heritage List</b>	Architecturally and aesthetically, the ATC tower, and the other buildings within the Airservices compound, is a conventional and unremarkable example of design of the 1960s.

<sup>45</sup> Lovell Chen, 2017. Bankstown Air Traffic Control Tower No. 2 Heritage Management Plan. Report prepared for Air Services Australia, 24.

<sup>46</sup> Lovell Chen, 2017. Bankstown Air Traffic Control Tower No. 2 Heritage Management Plan. Report prepared for Air Services Australia, 25.

<sup>47</sup> Lovell Chen, 2017. Bankstown Air Traffic Control Tower No. 2 Heritage Management Plan. Report prepared for Air Services Australia, 29.

<sup>48</sup> Lovell Chen, 2017. Bankstown Air Traffic Control Tower No. 2 Heritage Management Plan. Report prepared for Air Services Australia.

Criteria	Description
<b>F – Commonwealth Heritage List</b>	The design of the tower is responsive to technical and other functional requirements but is not in any sense exceptional in terms of creative design or technical achievements.
<b>G - Commonwealth Heritage List</b>	It is possible that Bankstown ATC tower no. 2 is of social value to current or former employees or of interest to specialist aviation groups - no detailed social value assessment was undertaken as part of this HMP. However, even if they existed, it is considered that such associations or interest would be very unlikely to satisfy the threshold for Commonwealth Heritage value.
<b>H – Commonwealth Heritage List</b>	No association between Bankstown ATC tower no. 2 and the life or works of a person, or group of persons, has been revealed by the research undertaken for this HMP.
<b>I – Commonwealth Heritage List</b>	Bankstown Airport is not in an identified area of Aboriginal cultural heritage sensitivity, and the extent of physical change within the airport is such that it would seem unlikely that there is significant potential for the occurrence of Aboriginal sites or artefacts on the site. No evidence has come to that the control tower is significant because of its importance as part of Indigenous tradition.

### 5.2.1.3 Statement of significance

The statement of significance for the Bankstown Air Traffic Control Tower No. 2 item is as follows<sup>49</sup>:

*Bankstown Air Traffic Control (ATC) tower is of historical significance in a national context as a representative and substantially intact example of a standardised air traffic control tower form dating from the first phase of post-World War II design in air traffic control facilities (1950s-late 1960s). The Bankstown air traffic control tower, together with its equipment room and powerhouse, was designed by the Commonwealth of Australia Department of Works (NSW branch) for the Department of Civil Aviation. The complex was commissioned in 1970. The control tower is a utilitarian design comprising a square four-storey base in reinforced concrete with a face brick cladding, below a rectangular cantilevered walkway, also in reinforced concrete, around an octagonal cabin. The cabin is raised on a part-chamfered half-height duct and service space and octagonal cabin.*

*Bankstown is one of a group of control towers built essentially to the same operational and technical standards and specifications across Australia and Papua New Guinea from the 1950s until the late-1960s, when perimeter frame towers became the standard model for control towers at secondary and general aviation airports in Australia. Its design is derived from the 1950s air traffic control towers (Essendon, Hobart, Launceston and others), a model which was repeated and refined through the 1960s. While a late example of this standard type, Bankstown is distinguished from the majority of the other surviving examples through its intactness. Other than for the modification of windows at the upper level on the eastern elevation, the building is unaltered externally; internally it also retains the majority of its plan form and fabric. It is unusual in retaining its original timber-framed console, albeit modified. The associated radio equipment room and powerhouse are also intact externally.<sup>50</sup>*

<sup>49</sup> Lovell Chen, 2017. Bankstown Air Traffic Control Tower No. 2 Heritage Management Plan. Report prepared for Air Services Australia.

<sup>50</sup> Australian Heritage Database, 2016. 'Bankstown Airport Air Traffic Control Tower'. Accessed online 22 February 2021 at: <http://www.environment.gov.au/cgi->

## 5.2.2 Bankstown Aerodrome (Bankstown LEP Item No. I18)

### 5.2.2.1 Description

Bankstown Airport is a large complex situated to the east of the Georges River. The site is largely open, accommodating three parallel runways traversed at their western end by a single runway. The control tower is located at the western end of the site. Buildings and car parks associated with airport operations are situated at the north-eastern part of the site, while the facilities associated with Hawker de Havilland are located on the southern side of the airport. As was the case with most air bases, the original layout of the Airport was organised into functional zones, including zones for aircraft manufacture, accommodation and administrative blocks, hangars, aeroplane parks and a parade ground.

### 5.2.2.2 Assessment of significance

The assessment of significance for the Bankstown Aerodrome item is as follows:<sup>51</sup>

**Table 7: Heritage assessment for Bankstown Aerodrome**

Criteria	Description
<b>A – Historical Significance</b>	Bankstown Airport is historically significant because of the contribution that it and the local government area made to Australia's defence efforts during World War II. It demonstrates the strategic importance of the Bankstown region during World War II. The Airport was an important centre of aircraft manufacture and assembly during World War II. The airport has significance because of the impetus it gave to development in the locality during and after World War II.
<b>B – Associative Significance</b>	Does not satisfy this criterion.
<b>C – Aesthetic or Technical Significance</b>	Does not satisfy this criterion.
<b>D – Social Significance</b>	The place is significant for its continued airport use and its role in the Australian aircraft industry.
<b>E – Research Potential</b>	The place has research potential due to its uses as an air base and an aircraft manufacturing and assembly facility. It is understood to be the only air base in New South Wales to include more than three types of World War II era hangars surviving in-situ.
<b>F – Rarity</b>	Bankstown was the only air base to be associated with aircraft manufacture and was one of only two air bases in New South Wales associated with the assembly of aircraft manufactured elsewhere. It is the only air base in New South Wales to have more than three extant types of World War II hangars.
<b>G - Representativeness</b>	Bankstown Airport is considered to be a representative example of air bases constructed during World War II.

### 5.2.2.3 Statement of significance

The statement of significance for the Bankstown Aerodrome item is as follows<sup>52</sup>:

bin/ahdb/search.pl?mode=place\_detail;search=list\_code%3DCHL%3Blegal\_status%3D35%3Bkeyword\_PD%3D0%3Bkeyword\_SS%3D0%3Bkeyword\_PH%3D0;place\_id=106118

<sup>51</sup> NSW Department of Planning and Environment, 2001. 'Bankstown Aerodrome'. Accessed 20 March 2022 at: <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=1060175>

<sup>52</sup> Heritage NSW, 2001. Bankstown Aerodrome. State Heritage Inventory. Accessed online May 2021 at: <https://apps.environment.nsw.gov.au/dpcheritageapp/ViewHeritageItemDetails.aspx?ID=1060175>.

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*Bankstown Airport is historically significant because of the contribution that it and the local government area made to Australia's defence efforts during World War II. It demonstrates the strategic importance of the Bankstown region during World War II.*

*The airport has additional significance because of the impetus it gave to development in the locality during and after World War II.*

*Bankstown Airport is considered to be a representative example of a World War II air base. It was an important centre of aircraft manufacture and assembly during World War II - the only air base to be associated with aircraft manufacture and one of only two air bases in New South Wales associated with the assembly of aircraft manufactured elsewhere - and has research potential due to its uses as an air base and an aircraft manufacturing and assembly facility. It is understood to be the only air base in New South Wales to include more than three types of World War II era hangars surviving in-situ and has retained a relatively large number of World War II era buildings.*

*The place is significant for its continued airport use and its role in the Australian aircraft industry.*

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### 5.2.3 Significant views and vistas

The heritage features specific to Area 2 of Bankstown Airport, which encompasses the study area, are the view corridors between Areas 1, 2 and 3. However the 2018 HMP assessed these views as being of little significance, contributing little to the understanding of the historic significance of the area. Key views include the view of the Air Traffic Control Tower (CHL Place ID. 106118) from the Aviation Hangar Project, as well as views to the historic WWII Hangars in the Chevron Precinct to the north of the Aviation Hangar Project and the former de Havilland manufacturing hangars to the south Aviation Hangar Project.



**Figure 33: View of the Air Traffic Control Tower (CHL Place ID. 106118) from the Aviation Hangar Project, looking southwest.**



**Figure 34: View of building 131 and 14 from the Aviation Hangar Project, both of which are WWII aircraft erecting hangars, looking northeast.**



**Figure 35: View of the former de Havilland manufacturing hangars, looking south from the southern extent of the Aviation Hangar Project**

## 6.0 PROPOSED WORKS

### 6.1 The proposal

Aeria Management Group are proposing development options on the terminal-tarmac intersection at Bankstown Airport. As part of the development options for Bankstown Airport, the Aviation Hangar Project located in the northern portion of the airport is being considered for development to provide additional aviation facilities.

The proposed redevelopment of the Bankstown Airport Aviation Hangar Project (Figure 37) would involve construction of:

- Seven aircraft hangars. Three hangar types would be constructed, ranging from 24m to 34m in width, with a height of around 13.5m. Total hangars would occupy an area of around 7,800m<sup>2</sup>
- Two external mechanical tanks to the west
- Administration/office facilities (ancillary support zone), occupying an area of around 1,500m<sup>2</sup>
- Carparking, including 66 car spaces
- Landscaping, including plantings and on-site detention features

### 6.2 Project justification

The proposal is required to strengthen Bankstown Airport's position as a regional airport offering training, maintenance, and personal aviation, whilst ensuring that the evolving needs of tenants are met. The proposal seeks to overhaul the existing buildings, taxiways, and aircraft hangars to improve both airside and landside operations, as well as improve employee and pedestrian access and safety.



## 7.0 HERITAGE IMPACT ASSESSMENT

### 7.1 Overview

This section assesses the heritage impact of the proposed works at the study area on heritage values within the study area. Justifications are also provided for the proposed works.

Within this approach, the objective of a heritage impact assessment is to evaluate and explain how the proposed works would affect the heritage value of the study area and/or place. A heritage impact assessment should also address how the heritage value of the site/place can be conserved or maintained, or preferably enhanced by the proposed works.

In order to consistently identify the impact of the proposed works, the terminology contained in the following table has been references throughout this document. The terminology and definitions are based on those contained in guidelines produced by the International Council on Monuments and Sites (ICOMOS)<sup>53</sup> and the Heritage Council of NSW<sup>54</sup> and are shown in Table 8 and Table 9.

**Table 8: Terminology for assessing the magnitude of heritage impact.**

Grading	Definition
<b>Major adverse</b>	Actions that would have a severe, long-term and possibly irreversible impact on a heritage item. Actions in this category would include partial or complete demolition of a heritage item or addition of new structures in its vicinity that destroy the visual setting of the item. These actions cannot be fully mitigated.
<b>Moderate adverse</b>	Actions that would have an adverse impact on a heritage item. Actions in this category would include removal of an important part of a heritage item's setting or temporary removal of significant elements or fabric. The impact of these actions could be reduced through appropriate mitigation measures.
<b>Minor adverse</b>	Actions that would have a minor adverse impact on a heritage item. This may be the result of the action affecting only a small part of the place or a distant/small part of the setting of a heritage place. The action may also be temporary and/or reversible.
<b>Negligible</b>	Actions that are so minor that the heritage impact is considered negligible.
<b>Neutral</b>	Actions that would have no heritage impact.
<b>Minor positive</b>	Actions that would bring a minor benefit to a heritage item, such as an improvement in the item's visual setting.
<b>Moderate positive</b>	Actions that would bring a moderate benefit to a heritage item, such as removal of intrusive elements or fabric or a substantial improvement to the item's visual setting.
<b>Major positive</b>	Actions that would bring a major benefit to a heritage item, such as reconstruction of significant fabric, removal of substantial intrusive elements/fabric or reinstatement of an item's visual setting or curtilage.

<sup>53</sup> Including the document Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, ICOMOS, January 2011.

<sup>54</sup> <https://www.environment.nsw.gov.au/resources/heritagebranch/heritage/material-threshold-policy.pdf>

**Table 9: Terminology for heritage impact types**

Impact	Definition
<b>Direct</b>	Impacts resulting from works located within the curtilage boundaries of the heritage item.
<b>Potential direct</b>	Impacts resulting from increased noise, vibrations and construction works located outside the curtilage boundaries of the heritage item.
<b>Indirect</b>	Impact to views, vistas and setting of the heritage item resulting from proposed works outside the curtilage boundaries of the heritage item.
<b>Archaeological</b>	Impacts to potential archaeological remains located within the curtilage boundaries of the heritage item.

### 7.1.1 Impact to Bankstown Air Traffic Control Tower No. 2 (CHL Place ID #106118)

#### 7.1.1.1 Direct (physical) impacts

The proposed works involve redevelopment of the subject area into modern aviation facilities at Bankstown Airport. The Bankstown Air Traffic Control Tower No. 2, a listed item of Commonwealth significance, is located approximately 650m from the Aviation Hangar Project locality. The structure itself and its curtilage would not be physically altered as a result of the proposal.

The proposed works would result in a **neutral** direct (physical) impact to the Bankstown Air Traffic Control Tower No. 2 heritage item.

#### 7.1.1.2 Indirect (visual) impacts

While the Aviation Hangar Project locality is approximately 650m from the heritage listed Bankstown Air Traffic Control Tower No. 2, the height of the tower and layout of the airport runway system would enable intact view lines between the item and the study area. The proposed works would alter the wider setting and context of the heritage item, and result in changes to the character of the tower's wider visual catchment. However, as the study area does not have any formal heritage listings, changes to view lines are not regarded as significant. It is also noted the proposed works are consistent with the aviation character of the item's context.

The proposed works would result in a **negligible** indirect (visual) impact to the Bankstown Air Traffic Control Tower No. 2 heritage item.

### 7.1.2 Impacts to Bankstown Aerodrome (Bankstown LEP Item no. I18)

#### 7.1.2.1 Direct (physical) impacts

The proposal comprises redevelopment of the terminal-tarmac intersection at Bankstown Airport to create additional aviation facilities. This locality is within the curtilage of the locally listed Bankstown Aerodrome. Bound by taxiways, the study area comprises a large open grassed area and tarmacked area used for aircraft parking. Within this space, there are no existing built elements or landscape features assessed as being of 'High' significance, including any WWII era features. The proposal, which seeks to strengthen Bankstown Airport's position as a regional airport offering training, maintenance, and personal aviation through enhanced facilities, would enable the significant continued aviation use of the item and its role in the Australian aircraft industry. Within this context, it is not considered the proposal would result in any substantial impacts to the locally significant Bankstown Aerodrome heritage item.

The proposed works would result in a **negligible** direct (physical) impact to the Bankstown Aerodrome heritage item.

### 7.1.2.2 Indirect (visual) impacts

The proposed redevelopment of the Aviation Hangar Project locality to create additional aviation facilities would result in changes to views and vistas within the Bankstown Aerodrome, and the visual character within this part of the item's curtilage. This includes construction of several hangars and associated landscaping works in the immediate vicinity of several World War II era hangars that are assessed as being of 'High' significance. The proposed works would diminish the immediate setting of these heritage elements of the Bankstown Aerodrome, along with the setting of the nearby historic Chevron Precinct. The proposed hangars would not exceed the height or scale of nearby World War II era hangars, and as such the prominence of these significant elements within the Bankstown Aerodrome would be maintained. It is anticipated that the view lines between significant elements would not be compromised by the proposed works. It is noted the proposed works, which would provide additional aviation facilities, are consistent with the existing aviation use of the heritage item. The proposal would enable the significant continued aviation use of the item and its role in the Australian aircraft industry. Within this context, it is not considered the proposal would not result in any substantial visual impacts to the locally significant Bankstown Aerodrome heritage item.

The proposed works would result in a **minor adverse** indirect (visual) impact to the Bankstown Aerodrome heritage item.

### 7.1.3 Cumulative impact

Cumulative impacts represent the incremental loss of, or modifications to, a heritage item or archaeological resource over time. These can result from individually minor, but collectively significant, actions and must therefore be considered within the wider development context in order to minimise impacts.

The proposal is part of a suite of projects within the Bankstown Airport Master Plan.

## 7.2 Commonwealth Heritage Impacts

The Bankstown Air Traffic Control Tower No. 2 (Place ID #106118), a listed item of Commonwealth significance, is located approximately 650m from the Aviation Hangar Project locality. Therefore, it is necessary to employ the self-assessment process outlined in *Significant Impact Guideline 1.2* of the EPBC Act to assess the impacts of the proposed works on the heritage value of the item. The self-assessment process examines the environmental context of the Place, the proposed impact and avoidance or mitigation strategies to determine if a significant impact would occur.

The self-assessment contained within this report only takes into consideration the historical values of the CHL Place as TfNSW has engaged another consultancy to prepare the Aboriginal and natural values assessments for the study area. This assessment should only be accepted when viewed in conjunction with the results of the Aboriginal values self-assessment for the CHL Place. The responses to the questions posed by the Significant Impact Guideline 1.2 are contained within Table 10 below.

**Table 10: Significant Impact Guideline 1.2 responses for historical heritage values (EPBC Act 1999).**

Question	Response
<b>Step 1 – Environmental context</b>	
<b>What are the components or features of the environment in the area where the action will take place?</b>	<p>The proposed actions are to take place 650m from the CHL Place 'The Bankstown Air Traffic Control Tower No. 2 (Place ID #106118). The Bankstown Air Traffic Control Tower No. 2 is a heritage building located to the west of the airport. The complex is enclosed in a fence of cyclone and barbed wire. The Control Tower is part of the larger Bankstown Airport complex which is approximately 313 hectares in size, located 26km southwest from the Sydney CBD. The area is not known for important Indigenous and natural values, however is of historical value for its use during WWII as an airbase and the post-WWII aviation industry and RAAF military training ground.</p> <p>The Aviation Hangar Project (location of the proposed actions) is located in the northern portion of the airport, bound by Taxiway K to the northeast, Taxiway A to the south-west, Taxiway C to the west and Taxiway A4 to the east.</p> <p>Specifically, the proposed actions would not impact the CHL Place.</p> <p>Aboriginal cultural heritage values and natural heritage values were not assessed as part of this report.</p>
<b>Which components or features of the environment are likely to be impacted?</b>	<p>The proposed works would not impact on any previously identified built fabric as part of the CHL Place.</p> <p>Aboriginal cultural heritage values and natural heritage values were not assessed as part of this report.</p>
<b>Is the environment which is likely to be impacted, or are elements of it, sensitive or vulnerable to impacts?</b>	<p>The historical values relating to the CHL Place are not considered to be vulnerable to impacts as a result of the proposed actions. However, mitigation and management recommendations would help to reduce the risk of inappropriate impacts to the majority of these elements. It is not considered that the historical values of the CHL Place would be adversely impacted by the proposed works.</p> <p>Aboriginal cultural heritage values and natural heritage values were not assessed as part of this report.</p>
<b>What is the history, current use and condition of the environment which is likely to be impacted?</b>	<p>The land present within the current study area is not part of the CHL Place curtilage. The land of the study area and the CHL Place has historically been used for aviation as part of the Bankstown Airport, and its former uses as a RAAF training base and WWII airbase. The CHL Place is largely intact as constructed. The land pertaining to the current study area is an open field site.</p> <p>An inspection was also carried out by Artefact, as documented in Section 4.0 of this report.</p> <p>Aboriginal cultural heritage values and natural heritage values were not assessed as part of this report.</p>
<b>Step 2 – Proposed impacts</b>	
<b>What are the components of the Action?</b>	<p>The proposed actions would see the redevelopment of the Bankstown Airport Aviation Hangar Project and involve the construction of:</p> <ul style="list-style-type: none"> <li>• Seven aircraft hangars. Three hangar types would be constructed, ranging from 24m to 34m in width, with a height</li> </ul>

Question	Response
	<p>of around 13.5m. Total hangars would occupy an area of around 7,800m<sup>2</sup></p> <ul style="list-style-type: none"> <li>• Administration/office facilities (ancillary support zone), occupying an area of around 1,500 m<sup>2</sup></li> <li>• Carparking, including 66 car spaces</li> <li>• Landscaping, including plantings and on-site detention features</li> </ul> <p>The proposed actions would however be located at a significant distance (650m) from the CHL Place.</p> <p>Aboriginal cultural heritage values and natural heritage values were not assessed as part of this report.</p>
<p><b>What are the predicted adverse impacts associated with the action including indirect consequences?</b></p>	<p>The proposed actions have been assessed as having neutral direct and negligible indirect impacts to the CHL Place, due to the works being located a substantial distance away.</p> <p>Whilst the proposed actions would alter the wider setting and context of the CHL Place, views have not been assessed as significant contributions to the overall significance of the CHLP Place and are consistent with the aviation character of the CHL Place's context.</p> <p>Aboriginal cultural heritage values and natural heritage values were not assessed as part of this report.</p>
<p><b>How severe are the potential impacts?</b></p>	<p>The proposed actions have been assessed against the Significant Impact Guidelines 1.2 of the EPBC Act and are considered to be small scale, low intensity and localised to the study area, and at a distance of 650m from the CHL Place. As a result, the overall impact to the Place is considered to be neutral. The actions are also reversible should the proposed works be removed in the future.</p> <p>Aboriginal cultural heritage values and natural heritage values were not assessed as part of this report.</p>
<p><b>What is the extent of uncertainty about potential impacts?</b></p>	<p>Comprehensive investigations have been undertaken for historical heritage values for the Bankstown Air Traffic Control Tower No. 2. As such, these heritage values and their relationship with the study area are well understood.</p> <p>The potential impacts associated with the proposed works are well understood and would result in a neutral direct and negligible indirect impact to the CHL Place. Heritage recommendations within this assessment would also help to ensure impacts are minimised.</p> <p>Aboriginal cultural heritage values and natural heritage values were not assessed as part of this report.</p>
<p><b>Step 3 – Impact avoidance and mitigation</b></p>	
<p><b>Will any measures to avoid or mitigate impacts ensure, with a high degree of certainty that impacts are not significant?</b></p>	<p>The proposed actions 650m from the CHL Place have been assessed as having a small scale, low intensity and localised impact to the study area. As a result, the overall impact to the Place is considered to be neutral. The actions are also reversible should the proposed works be removed in the future.</p> <p>Based on overall impacts and mitigation measures in place, these necessary impacts would not detract or contain any adverse effects on the CHL Place as a whole.</p>

Question	Response
	Aboriginal cultural heritage values and natural heritage values were not assessed as part of this report.
<b>Step 4 – Are the impacts significant? Is there a chance or possibility the action will:</b>	
<b>Permanently destroy, remove or alter the fabric of a heritage place?</b>	<p>The works would not result in impacts to the heritage fabric of the CHL Place. It would not permanently destroy, remove or alter the fabric.</p> <p>Aboriginal cultural heritage values and natural heritage values were not assessed as part of this report.</p>
<b>Involve extension, renovation, or substantial alteration of a heritage place in a manner which is inconsistent with the heritage values of the place?</b>	<p>The proposed works would not involve extension, renovation, or substantial alteration to the CHL Place.</p> <p>Aboriginal cultural heritage values and natural heritage values were not assessed as part of this report.</p>
<b>Involve the erection of buildings or other structures adjacent to, or within important site lines of a heritage place which are inconsistent with the heritage values of the place?</b>	<p>The proposed actions would involve the erection of buildings and structures; however, these would be located 650m away from the CHL Place and therefore would not impact the heritage values of the place.</p> <p>Aboriginal cultural heritage values and natural heritage values were not assessed as part of this report.</p>
<b>Substantially diminish the heritage value of a heritage place for a community or group for which it is significant?</b>	<p>No, the works would not substantially diminish the heritage values of places in the study area.</p> <p>Aboriginal cultural heritage values and natural heritage values were not assessed as part of this report.</p>
<b>Substantially alter the setting of a heritage place in a manner which is inconsistent with the heritage values of the place?</b>	<p>No, the works would not substantially alter the settings of heritage values of places in the study area.</p> <p>Aboriginal cultural heritage values and natural heritage values were not assessed as part of this report.</p>
<b>Substantially restrict or inhibit the existing use of a heritage place as a cultural or ceremonial site?</b>	<p>No, the works would not restrict or inhibit access.</p> <p>Aboriginal cultural heritage values and natural heritage values were not assessed as part of this report.</p>

### 7.3 Heritage Management Plan policies

There are a number of policies contained within the Bankstown Airport HMP which are relevant to the proposal. These policies and how they have been addressed by the proposal are outlined in Table 11.

**Table 11: Bankstown Airport HMP policies**

Policy	How is this addressed in the proposal?
<i>Policy 5 – Consider heritage when change is proposed</i>	The history and heritage values of the Aviation Hangar Project locality has been researched and recorded as part of this SoHI, prior to the commencement of the proposal.
<i>Policy 7 – Future use compatible with significance</i>	The proposed modern aviation facilities would enable the continued aviation and Australian aircraft industry use of the site, which is an identified aspect of Bankstown Airport’s heritage significance.
<i>Policy 9 – Relevant oversight of works by heritage consultant</i>	Artefact Heritage have been engaged to prepare this SoHI, including appropriate mitigation measures, for the proposal.
<i>Policy 13 – Suitable mitigation implemented</i>	Artefact Heritage have been engaged to prepare this SoHI, including appropriate mitigation measures, for the proposal.
<i>Policy 14 – Preparation of a Heritage Impact Statement</i>	Artefact Heritage have been engaged to prepare this SoHI, including appropriate mitigation measures, for the proposal.
<i>Policy 17 – Principle of as much as necessary, as little as possible</i>	The provision of additional modern aviation facilities within Bankstown Airport is anticipated to strengthen the airport’s position as a regional airport offering training, maintenance, and personal aviation, along with provision of updated facilities.
<i>Policy 18 – Intervention restricted to areas of lesser significance</i>	The proposal is within an area of lesser significance, being adjacent to but beyond the Chevron Precinct. Mitigation measures have been proposed to lessen impacts to the overall significance of the airport.
<i>Policy 35 – New facilities avoid heritage</i>	The proposed Aviation Hangar Project works would not result in demolition of any heritage buildings within Bankstown Airport.
<i>Policy 36 – New facilities sited to minimise impact</i>	The proposed Aviation Hangar Project works would not result in demolition of any heritage buildings within Bankstown Airport.
<i>Policy 37 – Minimise visual impacts of new facilities</i>	The new aviation facilities would be placed in a similar ‘chevron’ orientation to the nearby Chevron Precinct elements. The heights and configurations of the new aviation facilities would not exceed the current specifications of the precinct.
<i>Policy 38 – New development subject to Heritage Impact Statement</i>	Artefact Heritage have been engaged to prepare this SoHI, including appropriate mitigation measures, for the proposal.
<i>Policy 39 – Chevron defining pattern that must be retained</i>	The defining pattern of the adjacent Chevron Precinct would not be impacted by the proposed Aviation Hangar Project works.
<i>Policy 59 – Interpretation incorporated into major development</i>	Artefact Heritage have been engaged to prepare heritage interpretation as part of a wider Chevron Precinct Heritage Interpretation Strategy.
<i>Policy 60 – Preparation of Interpretation Plan</i>	Artefact Heritage have been engaged to prepare heritage interpretation as part of a wider Chevron Precinct Heritage Interpretation Strategy.
<i>Policy 61 – Interpretation may include revealing of hidden elements/fabric</i>	Artefact Heritage have been engaged to prepare heritage interpretation as part of a wider Chevron Precinct Heritage Interpretation Strategy.
<i>Policy 62 – Major works preceded by archival recording</i>	A photographic archival recording has been recommended as part of the mitigation measures in this SoHI (see Section 8.3)

Policy	How is this addressed in the proposal?
Policy 63 – Publicly available record	A photographic archival recording has been recommended as part of the mitigation measures in this SoHI (see Section 8.3). This photographic archival recording would be made publicly available in accordance with the (former) NSW Heritage Office guidelines for <i>Photographic Recording of Heritage Items Using Film or Digital Capture</i>

## 7.4 Statement of heritage impact

A statement of heritage impact has been prepared in accordance with the model provided in the NSW Heritage Division (now Heritage NSW) guidelines which delineates a statement of heritage impact into three key component questions in Table 12.<sup>55</sup>

**Table 12: Statement of Heritage Impact for the proposed works**

Impact	Discussion
<b>What aspects of the proposal respect or enhance the heritage significance of the study area?</b>	The proposal includes construction of new hangar facilities that reference the orientation/configuration of hangars within the nearby Chevron Precinct, which interprets the significant spatial qualities in this historic part of Bankstown Airport.
<b>What aspects of the proposal could have a detrimental impact on the heritage significance of the study area?</b>	<p>The proposed works are in the immediate vicinity of Bankstown Airport's Chevron Precinct. Under the Bankstown Airport Master Plan, the Chevron Precinct is noted as the 'historical "heart" of the Airport'.<sup>56</sup> This statement implies that the Chevron Precinct is the most important heritage site under the control of the Master Plan, apart from the CHL listed Control Tower.</p> <p>The proposal involves construction of new aviation facilities directly adjacent World War II era hangars within the Chevron Precinct. This would result in indirect visual impact to the Bankstown Aerodrome item. The proposed hangars would not dominate or detract from the prominence of nearby elements within the Chevron Precinct. It is noted the proposed works, which comprise provision of additional aviation facilities, are generally consistent with the existing use of the airport and its role within Australia's aircraft industry, and as such any visual impacts would be relatively minor in nature.</p>
<b>Have more sympathetic options been considered and discounted?</b>	The proposal is considered the most sympathetic option that is in line with the current and future safety needs of Bankstown Airport. The proposal would enhance the continued aviation use of the site, which is an identified aspect of the significance of the Bankstown Airport.

<sup>55</sup> NSW Heritage Division, *Statements of Heritage Impact*. Accessed online

<https://www.environment.nsw.gov.au/resources/heritagebranch/heritage/hmstatementsofhi.pdf>

<sup>56</sup> AECOM, 2018. Bankstown Airport Masterplan – Bankstown Airport Heritage Management Plan. Report prepared for Bankstown Airport Limited.

## 8.0 CONCLUSION

### 8.1 Conclusion

This SoHI has been prepared in accordance with the requirements and guidelines set out in the *Airports Act 1996*, *EBPC Act*, *EBPC Regulations*, *EP&A Act*, *Heritage Act 1977* and *The Burra Charter*.

The report concludes that:

- The study area is located within Bankstown Airport, a Commonwealth-owned site. The study area is within the central portion of the airport that is designated as the 'Aviation Zone' (Area 2) in the Bankstown Airport Master Plan 2019
- The study area is located within, or in the vicinity of, two listed heritage items of local and Commonwealth significance:
  - Bankstown Aerodrome (Bankstown LEP 2015 Item No. I18)
  - Bankstown Airport Air Traffic Control Tower (CHL Place ID #106118)
- The locality is not subject to statutory or non-statutory heritage protections
- Although, the study area is located in the vicinity of the Chevron Precinct at Bankstown Airport, a highly significant zone comprising World War II era hangars, auxiliary buildings and non-structural elements classified variously as being of 'high' and 'moderate' significance, the study area itself has not been identified to be located within an area of Heritage and Environmental Significance under the Bankstown Airport Heritage Management Plan
- The proposal is envisaged to strengthen Bankstown Airport's position as a regional airport offering training, maintenance and personal aviation through enhanced facilities
- As part of this report, the proposal has been assessed as having **neutral direct** and **negligible indirect** impacts to the Commonwealth Heritage Place, due to the works being located a substantial distance away
- As part of this report, the proposal has been assessed as aligning with the Bankstown Airport Heritage Management Plan policies and has recommended mitigation measures to further align with the policies
- As part of this SoHI, the proposal has been assessed as having the following impacts to heritage:
  - The proposal would have a **neutral** direct (physical) impact to the Bankstown Air Traffic Control Tower No. 2 (CHL Place ID #106118) heritage item, as the structure would not be physically altered by the proposal
  - The proposal would have a **negligible** indirect (visual) impact to the Bankstown Air Traffic Control Tower No. 2 (CHL Place ID #106118) heritage item, as the wider setting and visual catchment of the item would be altered
  - The proposal would have a **negligible** direct (physical) impact to the Bankstown Aerodrome (Bankstown LEP Item No. I18) heritage item majority of original structures associated with WWII from the item

- The proposal would have a **minor adverse** indirect (visual) impact to the Bankstown Aerodrome (Bankstown LEP Item No. I18) heritage item, altering the overall visual character of the item and modifying a key visual identifier of the airport from the ground and the air.
- The recommendations listed below would assist in mitigating the above heritage impacts to the Bankstown Aerodrome item

## 8.2 Approval pathways

The proposed works would not require referral under the EPBC Act.

Bankstown Airport, as a privately-leased Commonwealth airport, is subject to the planning frameworks set out in the *Airports Act 1996* and associated *Airports (Environment Protection) Regulations 1997*. Under Part 5 of the Act, the Commonwealth retains responsibility for land use, planning and the regulation of building activities on Commonwealth-leased airports.<sup>57</sup> Part 5 stipulates that each airport must have a final Master Plan outlining planning controls with Major Development Plans required for major airport developments, including any that affect an area identified as 'environmentally significant'.<sup>58</sup> This control includes items of heritage significance.

State and local government planning instruments do not apply to Commonwealth land; however, the Act requires the Master Plan for each airport to demonstrate consistency with these planning schemes. As such, this Statement of Heritage Impact will be prepared to meet the requirements of the NSW *Heritage Act 1977* where relevant. This Statement of Heritage Impact will form part of the Master Plan documentation to demonstrate consistency with the State and local planning schemes.

## 8.3 Recommended mitigation measures

The following mitigation measures should be considered:

- Prior to construction, the Aviation Hangar Project locality should be formally documented in situ via photographic archival recording according to the (former) NSW Heritage Office guidelines for *Photographic Recording of Heritage Items Using Film or Digital Capture*.

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<sup>57</sup> Commonwealth Legislation, 2016. *Airports Act 1996*, No. 42.

<sup>58</sup> *Bankstown Airport Master Plan*, 2019. Report prepared for Bankstown Airport Limited, 110.

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