

11 November 2024

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Dear Tom

Bankstown Airport - Demolition of Building 62 (Former RAAF Headquarters)

AECOM Australia Pty Ltd (AECOM) has been engaged by Aeria Management Group (AMG) to prepare a development report relating to the proposed demolition of existing building on Site 62 (known as Building 62), the former RAAF Headquarters Building at Bankstown Airport.

AMG recognises the historical importance of aviation operations at Bankstown Airport and the role that the Airport played as a wartime airfield in WWII.

The former RAAF Headquarters Building, located on the eastern side of Airport Avenue, is a modular building that was constructed in stages during WWII.

After considerable investigations, including a Property Condition Report, a Statement of Heritage Impact and a Heritage Interpretation Strategy for the Building 62, AMG has concluded that the building is beyond rectification, cannot be reused or relocated, negatively impacts the future operations of the Airport, and therefore must be demolished.

This letter has been prepared to accompany the Airport Lessee Company Consent (ALC Consent) application, which proposes to demolish Building 62 at Bankstown Airport.

1.0 Site Description

Building 62, the former RAAF Headquarters Building, is located at 13 Airport Avenue, Bankstown Airport, on the north-eastern corner of the intersection of Airport Avenue and Comper Street (see Figure 1).

The legal description of the site is Lot 318 in Deposited Plan 1077440.

The building is situated on a site of approximately 6,300 square metres in area. The building is located in the south-western corner of the site. The remainder of the site is vacant.

The building has a total floor area of approximately 320 square metres, with the curtilage around the building recently being secured with security fencing, forming a site of approximately 730 square metres in area.

Whilst AMG has no immediate plans for the development of Site 62, the site's two main road frontages (including frontage to Airport Avenue – the major vehicle entrance to Bankstown Airport) and direct airside access to Apron N1, the site provides excellent opportunities for new aviation facilities.



Figure 1 Location Plan – 13 Airport Avenue – Building 62 (former RAAF Headquarters Building)

2.0 Building History

The former RAAF Headquarters Building is a modular building that was constructed in stages during WWII.

The first module of the original building, with its central core form (without wings), was built in 1940. The building faced east. Two other modules were included by 1943, making a U-shape of three standard 'barrack' buildings with a portico at the rear. The rear area (eastern side) faced the parade ground.

The building is timber framed and clad in weatherboard, with an asbestos cement roof.

The building remained a RAAF Headquarters until around 1980, although it was briefly leased to Fairey Aviation as office space in the 1950s. Its most recent occupation was by Precision Flight, used for simulator training of pilots and as an administration office. Post WWII, the Parade Grounds were removed.

The building has been unoccupied since 2005 and has fallen into a severe state of disrepair. It is currently enclosed by security fencing due to the unstable structure and extensive asbestos contamination throughout the building.

3.0 Proposed Development

The current proposal by AMG is to demolish Building 62.

The decision to demolish the building is due to safety concerns and its dilapidated condition. Recent detailed investigations have confirmed that the building contains significant structural issues, along with large amounts of hazardous materials (asbestos).

Options for the retention, remediation and restoration of the building have been investigated, but such measures are not viable or appropriate, given the condition of the building.

As such, the current proposal is to demolish the existing building on the site. There are no plans for the future use of the site forming part of this application. Any such plans will be the subject of a separate application/approval process.

It should be noted that retention of the existing building would pose restrictions on a site which has main road frontages and direct airside access to Apron N1, thereby negatively impacting on the future operations of the Airport.

4.0 Legislative Framework

Since the late 1990s/early 2000s, the major Australian city airports owned by the Commonwealth Government have been privatised.

The Commonwealth Government is the owner of the land on which Bankstown Airport operates and Bankstown Airport Pty Limited (BAPL) holds the long-term registered lease from the Commonwealth over the land. BAPL trades under the name of Aeria Management Group (AMG) and has an obligation under its lease to continue to grow and develop the Airport.

Within Australia, there are four primary levels of Heritage Listing that can apply to a building, object, or area of heritage significance – depending on importance relative to their location. The levels of heritage are World, National and Commonwealth, State and Territory, and Local.

Each level of listing has slightly different criteria for assessing items, depending on value to the locality, and also different levels of protection offered by the heritage listing.

Key legislation relating to the management and operation of privatised Australian airports, including managing the heritage values and items of such airports, include:

- *Airports Act 1996* (Airports Act) and associated Regulations (*Airports Regulations 2024*, and *Airports (Environment Protection) Regulations 1997*)
- *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and associated Regulations (*Environmental Protection and Biodiversity Conservation Regulations 2000*)

Preparation and implementation of a Heritage Management Plan (HMP) is required under Section 341S of the EPBC Act for places listed on the Commonwealth Heritage List (CHL).

The only building/structure on Bankstown Airport which is listed on the CHL is the Bankstown Airport Air Traffic Control Tower. The Control Tower is owned and managed by Airservices Australia and is subject to its own HMP.

Given Bankstown Airport is owned by the Commonwealth Government, State and Local levels of heritage do not apply to Bankstown Airport.

Although the Airport is not listed on the CHL, BAPL recognises its heritage significance and undertakes the management of the Airport in accordance with the Commonwealth Heritage management principles referred to in Section 341Y of the EPBC Act and Schedule 7B of the *Environmental Protection and Biodiversity Conservation Regulations 2000* (EPBC Regulations).

Part 3 of the *Airports Regulations 2024*, established under the Airports Act, also identifies the need to prepare an Airport Environment Strategy for an airport by the Airport Lessee company. In particular, Regulations 16 and 17 set out the requirements for the Airport Environment Strategy, and Regulation 17(2)(d) makes specific reference to managing items of heritage value:

d) identification, and conservation, by the airport-lessee company and other operators of undertakings at the airport, of objects and matters at the airport that have natural, indigenous or heritage value

Division 3 of the Airports Act requires the development and approval of a Master Plan for each airport to establish a strategic direction of the airport and the intended uses of the site, with other requirements identified. The Airports Act, Division 3, subsection 71(2)(h) stipulates that the content of a draft or final Master Plan includes an environmental strategy.

BAPL has prepared an Airport Master Plan, which includes an Airport Environment Strategy. Bankstown Airport Master Plan 2019 (Master Plan 2019) was approved by the then Minister for Infrastructure, Transport and Regional Development on 7 November 2019.

In addition, BAPL has prepared a Heritage Management Plan covering the whole of Bankstown Airport. The Bankstown Airport Heritage Management Plan (HMP) was finalised in December 2018 and is referenced in the Master Plan 2019.

5.0 Bankstown Airport Master Plan 2019

Master Plan 2019, prepared in accordance with the Airports Act, sets out a long-term plan to expand the aviation and broader economic and commercial role of the Airport. Master Plan 2019 establishes the framework to guide development at the Airport.

Section 8 of Master Plan 2019 relates to land use planning controls at Bankstown Airport. The Airport is divided into four land use zones, with Building 62 located within the Airport Business Zone.

The Airport Business Zone is located in the northern part of the Airport site. It is the historical 'heart' of the Airport and includes the main terminal and aviation area (including the Airport Chevron and airport-related businesses), and neighbouring facilities such as Georges River Grammar School and retail facilities.

The Aviation Business Zone is further divided into two Precincts, with Building 62 being located within the Aviation Business and Commercial Precinct.

The objectives of the Aviation Business and Commercial Precinct are to:

- Provide an area accommodating aviation operations and related activities (including aviation attractions), commercial and business uses
- Provide an area accommodating aviation-related training and education facilities and associated infrastructure, including accommodation for students
- Recognise the Airport Chevron as the historical and critical aviation operational area for the Airport
- Deliver an integrated landscape theme throughout the precinct.

Master Plan 2019 includes a Structure Plan for the Airport Business Zone. Figure 2 is an extract of the Structure Plan, with the Building 62 shown.



Figure 2 Airport Business Zone Structure Plan

Source: *Bankstown Airport Master Plan 2019 (with annotation from AECOM)*

Figure 8.5 of Master Plan 2019 provides details of the Development Approval Decision-Making Process for Bankstown Airport, whilst Table 8.3 provides a breakdown of land uses envisaged within the Airport Business Zone. This is further expanded in Section 8.0 of this letter.

Section 12.0 of Master Plan 2019 is the Airport Environment Strategy. The purpose of the Airport Environment Strategy is to:

- Establish clear objectives for environmental management at the Airport and maintain and develop systems to achieve required outcomes
- Describe how BAPL will fulfil the vision for the Airport, as set out in this Master Plan
- Ensure statutory requirements are complied with
- Build on achievements detailed in the 2014 Airport Environment Strategy (2014 AES).

Specifically, Section 12.4.2 relates to Heritage and references the Bankstown Airport Heritage Management Plan (see Section 6.0, below). The heritage objectives of the Airport Environment Strategy are to:

- Manage sites and structures of heritage significance in accordance with the requirements of the Airports Act, AEPR and the EPBC Act
- Ensure that historic sites and structures are managed appropriately

This section of Master Plan 2019 recognises two Heritage Areas of Environmental Significance at Bankstown Airport, being:

- The Airport Control Tower
- The Chevron Area (being the pattern of roads, hangars and hardstand fanning out at the southern end of Airport Avenue – part of the original layout of the Airport)

Building 62 is not located within either of these Heritage Areas of Environmental Significance.

6.0 Bankstown Airport Heritage Management Plan

The Bankstown Airport Heritage Management Plan (December 2018) (HMP) covering the whole of Bankstown Airport, was prepared parallel with Master Plan 2019.

The objective of this HMP is to assist BAPL and its customers in the management of the assessed heritage values associated with the Airport assets.

The Building 62 is identified within the HMP as a 'High Heritage Value' item. It is not located within the Chevron Area (Area of Environmental Significance). The Conservation Statement for Building 62 states:

Development options compatible with the retention of the HQ building on its current site, in the context of the site of the Parade Ground, should be fully explored. However, if this is not practical, alternative options may be investigated, this could include relocation off the Airport. The building is known to contain asbestos. This material may be removed, but the building should be archivally recorded prior to removal works commencing.

There are a number of Heritage Management Policies within the HMP which are relevant to the assessment of any future plans for Building 62. These are included in Table 1.

Table 1 Bankstown Airport Heritage Management Plan Policies – Relevant to Building 62

Policy	Policy Details
Managing Change	
Policy 5	Consider heritage when change is proposed
Policy 6	Proposed changes or development should be considered within the context of the Airport as a whole
Policy 14	Any proposals for alteration or redevelopment affecting an item of high or moderate significance must be subject to a Heritage Impact Statement. A Statement of Heritage Impact is a required to consider the demolition or relocation of an item of high, moderate or low significance.
Minimising Impacts of Change on Significant Fabric	
Policy 16	Buildings of heritage significance must be managed in accordance with the advice provided in the individual Building Inventory Sheets
Policy 22	Demolition of heritage buildings should be discouraged unless future exceptional circumstances dictate otherwise. Demolition as a first option is not appropriate for heritage buildings, as the removal of heritage assets would impact on the overall Commonwealth heritage values of the Airport.
Policy 23	Where demolition is found to be the only feasible option for heritage assets, it should be carried out only following a Heritage Impact Statement prepared by a qualified heritage professional, implementing the mitigation measures identified within the Heritage Impact Statement.
Managing Structures of High Significance	
Policy 25	Buildings of High significance must be retained. The demolition of heritage buildings of high heritage value should only be undertaken in future exceptional circumstances where the operation of the Airport would be negatively impacted. All other options should be exhausted before considering demolition including, but not limited to, the following: <ul style="list-style-type: none"> a) Continued use of the building in appropriate roles; b) Adaptive re-use strategies; c) Transfer of asset to a new owner or consider leasing asset to community groups where appropriate; d) Relocation of the structure within Bankstown Airport or to another appropriate site that has an appropriate context; and

Policy	Policy Details
	e) Securing the building to an appropriate level of conservation and safety until an appropriate use can be identified.
Archival Recording	
Policy 62	Any heritage item proposed for demolition or affected by new works must be subject to archival photographic recording, this must include photography and measured drawings if required

7.0 Heritage Status Assessment

Consideration of the heritage status and assessment of the heritage values and structural integrity of Building 62 has been investigated and considered for some time.

Most recently, the following investigations have been undertaken in support of the Heritage Management Policies within the HMP relevant to the consideration of the future plans for Building 62 (the former RAAF Headquarters Building).

Such investigations have included:

- Property Condition Report, prepared by Cushman & Wakefield
- Non-Aboriginal Statement of Heritage Impact, prepared by Artefact
- Photographic Archival Record, prepared by Artefact
- Heritage Interpretation Strategy, prepared by Artefact

In addition, a Strategic Aviation Strategy prepared by KPMG has confirmed that the retention of Building 62 will negatively impact future aviation development at Bankstown Airport. Whilst not forming part of this application, consideration has been given to any future aviation development of the site to capitalise on the site’s two main road frontages (including frontage to Airport Avenue – the major vehicle entrance to Bankstown Airport) and direct airside access to Apron N1.

Copies of the Property Condition Report and the Statement of Heritage Impact are included as Attachments A and B, respectively.

The following is a brief summary of the key findings/outcomes of these reports.

Property Condition Report

Cushman & Wakefield has undertaken a condition assessment of Building 62 dated 10 October 202. The report concludes the following:

“Based on the age and defects noted to the timber framed superstructure, the vast majority of the building fabric and services being at or beyond the end of their economic life, and the above-mentioned cost analysis [current deficiencies cost of \$1.43 million – replacement cost in the order of \$1.36 million], we consider that the subject building would not be suitable for refurbishment or relocation to a new location within the Bankstown Aerodrome precinct.

A detailed condition assessment of the building is included in Section 3.2 of the Cushman & Wakefield Report.

Statement of Heritage Impact

The Artefact Non-Aboriginal Statement of Heritage Impact concluded that no formal heritage protections are associated with Building 62, and the following:

“Given the high significance of the RAAF Headquarters Building to the heritage of Bankstown Airport, its preservation would normally be considered in the first instance.

However, the building contains significant structural issues and a large amount of hazardous materials such as asbestos; its removal, while necessary, should be offset by suitable mitigation measures.

Given the dilapidated state of the building, further exploration of design options (such as retention, remediation, and restoration) for the study area will not be undertaken.

Consultation with the RAAF has been undertaken to allow them to provide input to the plan and/or document the site for their records prior to works commencing. The RAAF have expressed no interest in retaining the building.

The RAAF Building should be interpreted on site, as part of a broader interpretive strategy for the Bankstown Airport, focusing particularly on the role of the RAAF in the area during WWII.”

Photographic Archival Record

As recommended by Artefact, a photographic archival recording of the former RAAF Headquarters Building has been undertaken in accordance with the (former) NSW Heritage Office guidelines for *Photographic Recording of Heritage Items Using Film or Digital Capture*.

Heritage Interpretation Strategy

Artefact has prepared a Heritage Interpretation Memorandum for the former RAAF Headquarters Building.

The Heritage Interpretation Memorandum provides a brief description of the site, overview of significant heritage values, analysis and identification of key historic themes and stories of the site, and high-level recommendations for appropriate interpretive media options as part of any future redevelopment.

8.0 Planning Assessment

The current proposal is for the ‘Demolition’ of Building 62.

The following summarises the heritage status of Building 62:

- Building 62 is not on the Commonwealth Heritage register
- Demolition of Building 62 must be assessed against the Bankstown Airport Heritage Management Plan (HMP) and Master Plan 2019
- The HMP identifies Building 62 to be a ‘High Heritage Value’ item, but recognises that the building is in a poor condition and it may not be practical for its retention
- The HMP is referred to in the Airport Environment Strategy, contained within Master Plan 2019. The site is not identified as an ‘Area of heritage and environmental significance’ within the Airport Environment Strategy
- Building 62 has been assessed against the relevant provisions of the Airport Master Plan and the HMP – and it has been determined that such demolition is not likely to have a significant environmental impact

Given the above, the proposed demolition of Building 62 does not trigger the requirement for a Major Development Plan under section 89 of the Airports Act or a referral under the EPBC Act.

The approval pathway for the demolition of Building 62 is an Airport Lessee Company Consent (ALC Consent) and Airport Building Controller (ABC) Demolition Authorisation.

Table 8.3 of Master Plan 2019 is the Land Use Table for the Airport Business Zone. The table lists Permitted, Merit, Sensitive and Prohibited land uses within the Zone.

ALC Consent for demolition would normally be a Permitted Development – being ‘Ancillary’ to the primary development being proposed.

However, given the proposed demolition of Building 62 is not associated with any proposed future use of the site, and the demolition is of a ‘High Heritage Value’ item (as identified in the HMP), such activity is not specifically listed as a ‘Permitted’ land use in Table 8.3. Therefore, the proposed development falls into the classification of ‘Merit’ assessment.

In considering a ‘Merit’ assessment, the following process must be undertaken (as specified in Master Plan 2019):

- Consultation with the following:
 - Aviation authorities (i.e. Airservices and CASA)*
 - City of Canterbury Bankstown Council
 - Bankstown Airport Community Aviation Consultative Group
- * As the proposal is for ‘demolition only’, there is no need to refer the application to aviation authorities
- Public notification, involving:
 - Advertisement Notice in the Local Newspaper(s)
 - Letters to surrounding properties and airport tenants within a 50 metre radius of the site of the proposed development (this could be expanded at the discretion of AMG)
 - Letters to all adjoining/facing properties
 - Allowance of 10 business days for public responses

At the conclusion of this process, the ALC Consent Authority must give due regard to submissions made, and make a decision on the application, taking into consideration the requirements of the Master Plan 2019 and the HMP. If ALC Consent is issued, the ABC can then issue Demolition Authorisation.

9.0 Preliminary Engagement with Key Stakeholders

In preparing this Development Report for the demolition of Building 62, preliminary engagement has been undertaken with the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA) and the Department of Defence.

The following is a summary of such preliminary engagement.

Department of Infrastructure, Transport, Regional Development, Communications and the Arts

DITRDCA has confirmed the following:

- The former RAAF Headquarters Building does not feature on either the Commonwealth or State Heritage registers – the responsibilities for consideration of the future of the building rest within the HMP
- The Airport Environment Strategy (AES), contained within the current in force Master Plan, provides a commitment to implement the HMP
- Should the actions of BAPL towards the RAAF Building be undertaken in accordance with the HMP, these actions would be compliant with the AES and therefore not pose any issues with Master Plan compliance

Department of Defence

The Department of Defence note that they have no interest in the former RAAF Headquarters Building at Bankstown Airport. The Department of Defence has confirmed that it has no ownership of or responsibility for the building, and therefore have no objection to whatever action the current owners or local authorities may choose to take in respect of the building.

10.0 Conclusion

After considerable investigations, including a Property Condition Report, a Statement of Heritage Impact and a Heritage Interpretation Strategy, AMG has concluded that Building 62 (the former RAAF Headquarters Building) is beyond rectification, cannot be reused or relocated, negatively impacts the future operations of the Airport, and therefore must be demolished.

This letter has been prepared as the basis of the Development Report to support the demolition application.

Whilst Building 62 is identified within the Bankstown Airport HMP as having 'high heritage value', its demolition does not trigger a Major Development Plan under the Airports Act and a decision on the future of the building must be made against Master Plan 2019 and the HMP.

Demolition of the building triggers a 'Merit' assessment and is subject to Agency and Public Consultation – before the ALC Consent Authority can make a decision on the application.

Yours faithfully



Brenton Burman
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AECOM

encl: Enclosures

Attachment A:

Structural and Condition Assessment

Attachment B:

Statement of Heritage Impact