

Assessment of Cultural Significance

5.1 Comparative Analysis

A comparative analysis is an examination of a place in relation to similar places. It is used to assist the assessment of significance, in particular criterion F and G; rarity and representativeness. Thus, this section compares Evans Head Memorial Aerodrome with EATS training bases and other WWII airfields and Bellman hangars (and hangars generally) with other similar sites to assist in establishing the aerodrome's levels of rarity and representativeness.

5.1.1 EATS Training Bases and Other WWII Airfields

The Evans Head No.1 BAGS aerodrome was one of the larger EATS bases developed, and among the larger RAAF bases generally. Many small and basic airstrips were developed during the war, independent of the EATS program. In tropical Australia, in particular, there were many strategically placed staging and forward defence bases, including a line of air fields running south from Darwin, and a series of Australian and American forward bases in north Queensland. Major bases in Townsville and Darwin still operate. By 1942 a minimum of 29 aerodromes were either in existence or under construction throughout Australia, but this number does not include the many small airstrips created for emergency and dispersal purpose, there being 23 aerodromes in the Sydney and 21 in the Murrumbidgee regions alone.

Of the EATS bases, those most comparable with the Evans Head example are the larger bases, with multiple runways and substantial base accommodation. Brew indicates that 'the importance of an aerodrome during wartime can be determined by the number, length and design of the runways. If an aerodrome had three lengthy runways that formed a triangle, it has far more significance than an aerodrome that has one short airstrip in a field.' The Evans Head aerodrome has four intersecting runways providing optimal landing bearing in relation to any wind direction.

On the basis of the thematic study⁵², the other large EATS bases appear to have been at Temora (4 runways), Tocumwal (3 runways), Nabiac (4 runways), and Schofields (3 runways), while those at Narrandera, Narromine, Tamworth, Wagga Wagga, Deniliquin, Port Pirie, Mount Gambier, Cootamundra appear to have been important bases, but no comparable information on size is readily available. The thematic study does not challenge a claim that Evans Head was the largest of the EATS training base⁵³, but the available comparative information does not allow this claim to be analysed.

Most of the WWII airfields were not transferred to active civil use after the war, and runways were not maintained. Evans Head was one of the few maintained after the war, and the runways, apart from recent shortening of runway 14/32 and the lengthening of runway 18/36 in 1985, are intact with varying degree of surface deterioration.

⁴⁹ Marks, R.R. 1994. *Queensland airfields WW2-- 50 years on*, R. & J. Marks, Brisbane; Venn, W.J. 1996. *Named airfields of the north-western command RAAF*, 1939-1945. W.J. & S.M. Venn, Armadale, Vic.

⁵⁰ Brew 2001: 28-29, quoting National Archives Australia record A705/1, 7/1/1699, & 35.

⁵¹ Brew 2001: 44.

⁵² Brew 2001

⁵³ Brew 2001: 24.



5.1.2 Bellman Hangars (and hangars generally)

The surviving Bellman hangar is one of a small number known to survive in NSW. While a comprehensive survey has not been undertaken, other examples are known to survive at Dubbo Stores Depot and Tocumwal Aerodrome.⁵⁴

Bellman hangars were a war-time response to particular needs – in this case the rapid construction of many bases requiring prefabricated easily-erected hangars. The design was British, but fabricated in Australia. The Bellman hangar is less significant in terms of innovation than the laminated hardwood-truss hangars developed in Australia during the war, but is still a significant component of the response to Australia's particular war-time needs.

The surviving Bellman hangar at Evans Head is in poor condition compared with the reported condition of some of the other surviving examples. Its coastal location probably contributes to its deterioration.

5.1.3 Machine Gun Pit

No descriptive material has been located with which to compare the machine gun pit.

5.1.4 Level of Heritage Significance

Evans Head Memorial Aerodrome is the only BAGS base built in New South Wales and the only one built in the first phase of the EATS program in 1939/1940. It is also the only one to be listed on a statutory heritage register. ⁵⁵

The surviving Bellman hangar at the aerodrome, although in poor condition compared to other examples, is still a significant example of its type, and has strong historical links to the important Evans Head RAAF operations. The presence of the surviving hangar reinforces the overall significance of the Evans Head Memorial Aerodrome.

In this comparative context Evans Head Aerodrome stands out as having high heritage significance, being one of the significant Australian WWII airfields, both in the context of EATS and the overall wartime defence establishment.

The level of heritage significance is confirmed by Ainsworth Heritage (2006) who state:

Evans Head Memorial Aerodrome, which has previously been assessed as being of high cultural heritage significance, contains a number of distinct and potential archaeological resources relating to the RAAF use of the site during World War II. These resources have a high level of historic significance relating to the sites' important role during the war as Australia's first Bombing and Gunnery School established under the Empire Air Training Scheme. The aerodrome also has an exceptionally high level of social significance to the local community, the aviation community and for ex-service men and women.

⁵⁴ Brew 2001: 43-44.

⁵⁵ Ainsworth Heritage, 2006

HERITAGE COUNCIL OF NEW SOUTH WALES

PLAN

UNDER	THE	HERITAG	E ACT.	1977
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GHD Pty Ltd

2/115 West High Street Coffs Harbour NSW 2450 PO Box 1340 Coffs Harbour NSW 2450 T 61 2 6650 5600 F 61 2 6652 6021 E cfsmail@ghd.com.au www.ghd.com.au

HERITAGE COUNCIL'S PLAN OF REGISTERED AREA



5.2 Definition of Curtilage

The historical curtilage of the Evans Head Aerodrome might be taken to be the wartime boundary of the base. This curtilage has been compromised by the encroachment of residential and light industrial development across the southern boundary and in the area of the wartime accommodation infrastructure.

The current heritage curtilage is best defined by that entered in the State Heritage Register, which includes the extended runway and adjacent land to the north, and the exclusion of the light industrial zone, but including the Council Works Depot and adjacent apron, and the land north of Currajong Street (see Figure 4).

Statement of Significance

The Evans Head Memorial Aerodrome is listed in the NSW State Heritage Register (SHR). Therefore the Assessment Criteria applying to that register are used here to assess the heritage significance of the place. This statement of significance is based on that for the SHR, but has been redrafted to reflect the historical and physical analysis included in this report.

The Evans Head Memorial Aerodrome has historical and social significance. The aerodrome was one of the largest bases established under the Empire Air Training Scheme (EATS), and one of the largest operational RAAF bases in Australia during the World War II. The claim that it was the largest EATS training base in the Southern Hemisphere during World War II has not been confirmed. The scale of the base's operations is demonstrated by the four surviving runways and associated taxiways and tarred hangar aprons. The operations of the No 1 Bombing and Gunnery School (BAGS) and the No. 1 Air Observers School (AOS) played an important role in Australia's contribution of air crews to, initially, Britain's war effort, then to Australia's role in the Pacific war and home defence. The base also played a direct home defence role in providing local maritime surveillance and coastal defence.

The site contains one original Bellman Hangar of 17 originally built at Evans Head. The Bellman hangar, a British design, was introduced by Sir Valston Hancock, Director of Works, who later became the first commanding officer for the base, and modified for Australian conditions and manufactured in prefabricated sections by BHP. The surviving Bellman hangar is a good example of an innovative approach to wartime needs, and was one of the first erected and is one of a few intact and in situ examples in Australia.

The Evans Head Memorial Aerodrome was used after the war as a regional commercial aerodrome, and subsequently as a recreational aerodrome, a use that continues today. The continued association of the place with aviation activities is an integral part of its significance, and is a use that greatly enhances the recognition and understanding of its historical associations.

The site has social significance for the many ex RAAF and WAAAF service-men and -women who were associated with the aerodrome, civilian workers, local families and friends of people who served there and died during WWII. The site is used for ANZAC Day celebrations, and occasional reunions and celebrators events for those associated with the place's history. It is also significant to the people of the North Coast region, the residents of Evans Head and visitors who attend activities or are tourists. Moreover it is significant to the people of Evans Head because of the central role it played in the development of the village during and after the war, and because of the military presence in and above the village, which continues on a daily basis in the use of the



Southern Bombing Range. The aerodrome is a substantial landmark in Evans Head, from the ground and from the air.

The aerodrome has aesthetic significance because of its landmark qualities. Its sheer size as an open grassland area crossed by runways gives it a powerful sense of place when viewed from elevated viewpoints or the air, and its proximity to the Evans Head village and the coastline emphasise its strategic location and the scale of the RAAF Base during the war. It is one of the few remaining large coastal sites that retains some sense of wartime operations.

5.2.1 Elaboration of Significance Against Criteria

SHR Criteria A: Historical Significance

The item is historically significant because of its role as No 1 Bombing and Gunnery School (BAGS) and the No. 1 Air Observers School (AOS) for the Empire Air Training Scheme (EATS) which was an enormous Commonwealth undertaking to train air crew and personnel to assist the allies in World War II. It was also the home to over 5000 RAAF personnel who trained there during WW II for active service in Australia and overseas. More than a 1000 of these lost their lives during training and in active service overseas. The base also played a direct home defence role in providing local maritime surveillance and coastal defence.

SHR Criteria B: Associative Significance

The item is historically significant because of its association with Sir Valston Hancock and was the site of 17 Bellman Hangars (only one remains in its original location). The British-designed hangars were modified and built by BHP under the guidance of Sir Valston Hancock, Director of Works for the RAAF at the time, who was also responsible for bringing Bellman Hangars to Australia. He subsequently became the base's first commanding officer. Sir Valston Hancock was one of Australia's most distinguished airman and rose to become Chief Air Marshall of RAAF personnel. The item also has associations with RAAF personnel, the many women of the WAAAF who provided a wide range of support functions, and the USAAF whose personnel trained and served with Australian RAAF personnel.

SHR Criteria C: Aesthetic Significance

The item is aesthetically significant because of the landmark qualities. Its sheer size gives it a powerful sense of place when viewed from elevated viewpoints or the air, and its proximity to the Evans Head village and the coastline emphasise its strategic location and the scale of the RAAF Base during the war. It is one of the few remaining large coastal sites that retains some sense of wartime operations.

SHR Criteria D: Social Significance

The item is socially significant because the aerodrome is of great importance to surviving Australian RAAF and WAAAF personnel that served at Evans Head and is a legacy to their families. The aerodrome is a significant landmark from WWII and has strong connections to the people of Evans Head because of the central role it played in the development of the village during and after the war, with many of the personnel staying on within the village after the RAAF disbanded the base, or retiring to it subsequently. It is also significant locally because of the military presence it established in and above the village, which continues on a daily basis in the use of the Southern Bombing Range. The associated sites and structures in Evans Head are some of the more significant remaining landmarks from that era which visitors seek out during their visits to



Evans Head and which are examples of the main features of buildings and sites that characterised the RAAF Base at the time. The association of the aerodrome and the town form an important part of the village's cultural identity.

SHR Criteria E: Research Potential

The item is of research significant because of the war-induced technical innovations it exhibits and as a physical manifestation of the massive war-time training role facing the RAAF during WWII. The prefabricated Bellman Hangar and various accommodation buildings relocated elsewhere in Evans Head represent significant technical innovation and adaptation for that period. The role of the RAAF Base, the aerodrome, its history and its structures is a potential subject for High School studies

SHR Criteria F: Rarity

The item is rare in having key features of the larger EATS training scheme bases relatively intact and relatively free from later modification for new uses. The Bellman hangar is rare in that very few comparable examples survive.

SHR Criteria G: Representativeness

The item represents an important class of WWII aerodromes in NSW because of its size, strategic location and its pivotal role in the training of RAAF personnel for the war effort. This is reflected in the largely intact runway, taxiway and apron layout, and in the surviving in situ Bellman hangar.

Integrity/Intactness: While nearly all of the original buildings and fixtures of No 1 BAGS have been removed or relocated, examples of the major structural forms which constituted and dominated the RAAF Base, notably various wooden huts of the pre-fabricated type and the Bellman Hangar, exist and are intact. The additional sites and structures associated with the aerodrome provide an important link to the item and should be retained and protected as they are and continue to be landmarks to the locals and former RAAF personnel. (SHR text)

5.3 Hierarchy of Significance

The heritage / archaeological significance of features identified by Ainsworth Heritage (2006) within the each of the site zones are detailed in the following tables. The five zones are:

- Northern Hangar Zone;
- Southern Runway Zone;
- Southern Hangar / Works Depot Zone;
- Aerodrome Open Space and Runway Conservation Zone; and
- Peripheral Heritage Zone.

See Appendix G for zone plans that detail the location of site features.



 Table 2
 Northern Hangar Zone Archaeological Features

Feature Number	Feature Name	Archaeological Significance
05	Hangar Apron Areas	Moderate
11	Bellman Hangar	High
12	Bellman Hangar footprint	Low
13	Bellman Hangar footprints	Low
14	Bellman Hangar footprint	Low
15	Bellman Hangar footprint	Low
16	Bellman Hangar footprint	Low
17	Drainage systems and drain outlets (For locations see Drainage Plan, Figure 4.22, p.54)	Moderate
18	Water Main outlet – Northern Hangar Area	Moderate
19	Water Main outlet – Northern Hangar Area	Moderate
20	Building Footprints on Apron Area	Low
26	Aircraft Anchors – various scattered through Northern Hangar Area	scattered
27	Drain Grates – various scattered through Northern Hangar Area	Moderate
50	Runway Landscape	High
51	Hangar Landscape	High
56	Flight Support Buildings	Low
43	Gas Pipes	High

 Table 3
 Southern Runway Zone Archaeological Features

Feature number	Feature name	Archaeological significance
01	Runway 18/36	Moderate
05	Hangar Apron Areas	Moderate
08	Taxiway	Moderate
09	Taxiway	Moderate
10	Drainage systems and drain outlets (For locations see Drainage Plan, Figure 4.22, p.54)	Moderate



Feature number	Feature name	Archaeological significance
23	Petrol Tank footprint	Moderate
24	Petrol Tank footprint	Moderate
50	Runway Landscape	High
54	Petrol Tanks within Taxiways (Building #172 Building #173)	Moderate
66	Concrete bollards (plane anchors) Scattered underground – located during UXO investigations	Moderate
67	Concrete bollards (plane anchors) Scattered underground – located during UXO investigations	Moderate
68	Concrete bollards (plane anchors) Scattered underground – located during UXO investigations	Moderate

 Table 4
 Southern Hangar/Council Depot Zone Archaeological Features

Feature number	Feature name	Archaeological significance
05	Hangar Apron Areas	Moderate
10	Drainage systems and drain outlets (For locations see Drainage Plan, Figure 4.22, p.54)	Moderate
44	World War II Timber Hut (not in-situ, possible store)	Moderate
65	Runway Lighting System (Edges of all 4 runways)	Moderate
69	Bellman Hangar – Modified	Low
70	Building footings underground – located during UXO investigations	Moderate – Low
71	Concrete Bollards / Plane anchors (underground – located during UXO investigations	Moderate

Table 5 Aerodrome Open Space and Runway Conservation Zone Archaeological Features

Feature number	Feature name	Archaeological significance
01	Runway 14/32	Moderate
02	Runway 09/27	Moderate
03	Runway 18/36	Moderate



04	Runway 06/24	Moderate
06	Taxiway (northernmost taxiway)	Moderate
07	Taxiway	Moderate
10	Drainage systems and drain outlets (For locations see Drainage Plan, Figure 4.22, p.54)	Moderate
21	Petrol Tank footprint	Moderate
22	Petrol Tank footprint	Moderate
25	Oil Tank	Moderate
50	Runway Landscape	High
54	Petrol Tanks within Taxiways (RAAF Building #174 and Building #175)	Moderate
65	Runway Lighting System	Moderate – High
	(Edges of all 4 runways)	
72	Petrol Tank (RAAF Building # 340) -	Moderate
	Immediately south-east of Runway 18/36	

 Table 6
 Peripheral Heritage Zone Archaeological Features

Feature number	Feature name	Archaeological significance
28	Dump – north of Bellman Hangar	Low
29	Brick artefact scatter – former Test Butts	Low
30	Roads to test butts	Low - moderate
31	Service track	Low
32	Culvert	Moderate
33	25 yard Firing Range - Concrete slab	Moderate
34	Concrete bollards (plane anchors)	Moderate
35	Firing Range drainage	Moderate
36	Signals Building (Building #219) Footings	High
37	Drainage Channel – Industrial estate to former sports ovals	Low
38	Artefact Scatter – Former WAAAF housing area (contains fence and wire fence post, earth mounds, brick rubble, fig tree, succulents and lantana)	Moderate – High



Feature number	Feature name	Archaeological significance
39	Dispersal Road	Moderate
40	Dispersal Road	Moderate
41	Cast iron pipes (former RAAF rising main)	Low
45	Machine-Gun Pit and associated footings	High
46	Original Aerodrome Signage	High
47	WWII Aerodrome ablutions building	High
48	WWII Aerodrome ablutions building	High
49	Shed Footings and Ramp	Moderate
52	Defence Landscape	Moderate
57	Hutted Accommodation/Offices Area (Cleared area east of Bellman Hangar – north and north-west of Industrial Estate)	Low
58	Hutted Accommodation/Offices Area (In scrub north and north-east of Industrial Estate)	Moderate
59	Bomb Dump (Building #229)	Moderate
60	Bomb Dump (Building #230)	Low
62	Petrol Tank (Building #341)	Low
63	Sports Field Area (Sports Oval Rugby Pitch)	Moderate
64	Parade Ground (Parade Ground)	Moderate
73	Petrol Tank (building #341)	Moderate
74	Steel Strapping (underground – located during UXO investigations	Low
75	Insulators and 44 Galloon drum (underground – located during UXO investigations	Low
76	Sullage Pit (underground – located during UXO investigations	Low
77	Asbestos Sheeting (underground – located during UXO investigations	Low
78	Building footing and concrete slab (underground – located during UXO investigations	Moderate
79	Concrete Bollards (Aircraft Anchors) – Immediately south of Sewerage Treatment Plant	Moderate



Constraints and Opportunities

6.1 Implications Arising from Statement of Significance

A number of implications for future management arise directly from the Statement of Significance. These implications are based on the desire to protect and conserve aspects of the place that are of cultural significance, a desire firmly reinforced by the requirements imposed by the listing of the place in the State Heritage Register.

The implications for future management that arise from the Statement of Significance are:

- ▶ The form and layout of the surviving four runways, taxiways and hangar apron areas within the Plan of Management primary area are significant and should be conserved. The historical significance is about their layout and ability to be read in the landscape, rather than in the detail of their surface finish.
- ▶ The surviving Bellman hangar is significant in its own right, and more particularly in relation to the historical associations with the Evans Head Memorial Aerodrome, to warrant its conservation. Given the poor condition of part so the hangar fabric, restoration and reconstruction works are necessary to ensure its ongoing survival and effective use.
- ▶ The ongoing aviation use of the aerodrome is part of its significance, and should be continued.
- ▶ The historical and social associations of the aerodrome are not apparent to the uninformed visitor, and should be the subject of interpretation at the site and in Evans Head village.
- The ability of community groups with close associations with the aerodrome (such as veterans groups and the local community) to hold commemorative events and meeting at the aerodrome should be retained in future management decisions.

6.2 Statutory Listings and implications

6.2.1 State Heritage Register

The Evans Head Aerodrome was listed in the NSW State Heritage Register (SHR) on 22 November 2002 (see Figure 4). Listing on the SHR means that the NSW Heritage Council becomes the joint consent authority with the Richmond Valley Council for proposals that may affect the registered item's heritage significance. This process is facilitated by the provisions for Integrated Development Assessment (IDA) under the *Environmental Planning and Assessment Act* 1979.

Standard Exemptions

Routine maintenance and minor works are exempt from consent processes, by way of a series of Standard Exemptions ⁵⁶. The purpose of the Standard Exemptions is to clarify what kind of maintenance and minor works can be undertaken without needing Heritage Council approval. This ensures that owners are not required to make unnecessary applications for minor maintenance and repair. Anything done pursuant to the Standard Exemptions must be carried out in accordance with relevant guidelines issued by the NSW Heritage Office. A description of the relevant Standard

22/14289/1432 R3

⁵⁶ See *Standard exemptions for works requiring Heritage Council approval*, Heritage Office of NSW publication and website (publications link).



Exemptions is contained in Appendix C, and should be read in conjunction with the Heritage Office's Guidelines on Standard Exemptions.

Site Specific Exemptions

The owner may request the Heritage Council to recommend additional site specific exemptions for a heritage item listed on the State Heritage Register. These are for works other than those in the attached standard exemptions list. An application for site-specific exemptions can be made to the Heritage Council of NSW, on the basis of a conservation management plan or similar study carried out by an experienced heritage consultant.

It is recommended that the Heritage Council gazette the site-specific exemptions to ensure they come into force.

It is noted that any activity that will materially impact on the sites significance is not eligible for sitespecific exemptions. However activities that will enhance the sites significance may be eligible for an exemption.

Where an activity is not exempt or eligible for site specific exemptions, endorsement of the Plan does not give exemption from Heritage Council approvals.

Activities eligible for Site Specific Exemptions are documented in Schedule 6 of the *Evans Head Memorial Aerodrome – Draft Heritage Agreement*, presented as part of a Business Paper at the Ordinary Meeting of Council on Tuesday, 21 October 2008. Refer to Appendix H for a *Schedule 6 Activities Eligible for Site Specific Exemptions*.

Minimum Standards of Maintenance and Repair

Under the Act owners are required to meet minimum standards of maintenance and repair of listed items.⁵⁷ The standards are set out in the Regulation to the *Heritage Act*, and relate to:

- weatherproofing;
- fire protection;
- security; and
- essential maintenance.

These are minimum standards to ensure that heritage significance is maintained. They do not require owners to undertake restoration works, but where works are needed owners may apply for financial assistance through the Heritage 2001 funding program. Where these standards are not met and the heritage significance of the item is in jeopardy the Heritage Council will now have the power to order repairs after consultation with the owner. As a last resort, if negotiations have failed and the owner does not comply with the order, the Heritage Council can arrange for the works to be carried out and charge the expenses to the owner. The Minister may consent to the Heritage Council's prosecution of the owner for failure to comply with an order under this section of the Act.

Development activities requiring approval

For an item listed on the State Heritage Register the following activities require application to the Heritage Council:

a) any demolition;

⁵⁷ Minimum standards of maintenance and repair, Heritage Office of NSW publication and web site.



- b) damage to any part of the item;
- c) movement of a movable object or archaeological relic;
- d) excavation for the purpose of exposing or moving a relic;
- e) development of land on which the building, work or relic is situated, including intangible development such as subdivision or change of use;
- f) alteration of the building, work, relic or movable object;
- g) display of any notice or advertisement on the place, building, work, relic, movable object or land, or in the precinct;
- h) damage, destruction or removal of any tree or other vegetation from the place, precinct or land.

Where the proposed works will have a minimal impact on the heritage significance of the item, approval can be given by the Director of the Heritage Office under delegation from the Heritage Council. This option may be decided during discussion with the Heritage Office prior to the formal development application process.

Information required for an IDA

IDA applications referred to the Heritage Council need to be supported by a *statement of heritage impact*, which analyses and clearly states the impact of the proposal on the item's heritage significance. The *statement of heritage impact* should be developed in accordance with the Heritage Council Guidelines for Statements of Heritage Impact. This statement should include a statement of heritage significance, an archaeological assessment (where sub-surface works are proposed) and a conservation policy or conservation management plan. The level of support information required will vary with each application and depends on:

- (a) why the item is of heritage significance;
- (b) the complexity of the heritage item;
- (c) the type and extent of work proposed; and
- (d) the impact of the work on that significance.

For complex issues it may be useful to engage a consultant with heritage conservation experience to prepare a statement of heritage impact.

Key Guiding Principles for Evans Head Memorial Aerodrome

The NSW Heritage Office has identified 'Key Guiding Principles' for the future management of the aerodrome, as a registered place⁵⁸. These principles would guide the Heritage Office response to IDAs.

1. Aviation

Continued aviation use is important in maintaining the heritage values of the Aerodrome and this activity must be facilitated.

⁵⁸ Appendix A, letter RML01369, Reece McDougall, Heritage Office, to Brian Wilkinson, Richmond River Council, 27/10/03.



2. Conservation

The remnant fabric, scale and layout of structures and features of the Aerodrome are significant and need to be adequately managed at a level that reflects its heritage significance and provides heritage interpretation opportunities, particularly of its RAAF history.

Development proposals should not compromise either of these key guiding principles.

6.2.2 Heritage Agreement

The Heritage Act has provisions for heritage agreements to be made between the Minister and the owner of an item on the State Heritage Register. An agreement in relation to future use options for the aerodrome would bind future owners to the agreed conservation policies, and issues such as public access, exemptions of specific activities and restrictions and standards, ensuring the ongoing conservation of the heritage values of the aerodrome. Future owners would be able to take advantage of financial incentives available under the Heritage Agreement, these being relief relating to:

- Land tax relief;
- Payment of stamp duty; and
- Council rates.

A special "heritage valuation" is carried out when an item is added to the State Heritage Register. This can provide an owner with lower rates and land taxes. It acknowledges that retaining heritage significance is the "highest and best use" which can be achieved. This benefit is automatically extended to private owners of properties on the State Heritage Register.

6.3 Legislative and Policy Implications

6.3.1 1992 Evans Head Aerodrome Deed

The 1992 Evans Head Aerodrome Deed is an agreement made between the Commonwealth of Australia and the Richmond River Shire Council.

Pursuant to the Deed, Richmond River Shire Council assumed full financial responsibility for the Evans Head Aerodrome on 1 July 1992.

The Deed essentially sets out the responsibilities of the Local Authority (now known as Richmond Valley Council) in regards to the management, operation and maintenance of the Evans Head Aerodrome. The Deed compels the Council not to permit any development on the aerodrome which would impact on its air use. The Deed also permits Council, with the consent of the Secretary of Department of Transport and Communications (now Department of Transport and Regional Development), to dispose of land not required for aerodrome purposes.

6.3.2 Commonwealth Legislation

Environment Protection and Biodiversity Conservation Act 1999 [Comm]

The Environment Protection and Biodiversity Conservation Act 1999 (EPBC) establishes those matters of national environmental significance that need to be considered by the Commonwealth



when developments are proposed. The Act currently identifies seven matters of national environmental significance:

- World heritage properties
- National Heritage Plans
- Ramsar Wetlands of International Significance
- Listed threatened species and ecological communities
- Listed migratory species
- Commonwealth marine area; and
- Nuclear actions (including uranium mining)

Listed threatened species and listed migratory species are the only matters of national environmental significance within proximity to the Evans Head Memorial Aerodrome site. However as this Plan only identifies existing cleared areas of the site for future development and given the distance from the identified development areas from native vegetation, any proposed future uses of the aerodrome are not considered likely to have a significant impact on listed threatened and migratory species.

The Australian Government Department of the Environment, Water, Heritage and the Arts (DoEWHA) was contacted to confirm the requirement for referral of future development to the Department where items of national heritage significance are in proximity to the site. It was confirmed that there were no places on the National Heritage List or the Commonwealth Heritage List that are in proximity to the site and consequently no referral would be triggered under the EPBC Act, 1999. There are four sites listed on the Register of the National Estate within Evans Head, however items on this register do not trigger a referral to the DoEWHA⁵⁹.

6.3.3 State Legislation, Plans and Policies

Environmental Planning and Assessment Act 1979 [NSW] (EP&A Act)

As the Evans Head Memorial Aerodrome site is located on bushfire prone land and listed on the NSW State Heritage Register, any development proposed on the site would be considered integrated development, requiring development consent from Richmond Valley Council, NSW Rural Fire Service and the NSW Heritage Office (EP&A Act: Section 91).

Richmond Valley Council is required to take the matters outlined in Section 79(c) of the EP&A Act into consideration.

Heritage Act 1977 [NSW]

As the Evans Head Memorial Aerodrome is listed on the NSW State Heritage Register the provisions of the Heritage Act 1977 [NSW] are applicable to the site.

Section 57 of the Heritage Act 1977 [NSW] outlines the implications of interim heritage orders or listing on the State Heritage Register for those places and/or objects listed. The section also outlines the actions that may not be undertaken on the aerodrome site without approval.

22/14289/1432 R3

⁵⁹ Pers. Comm, Lawrence Burke, Heritage Division Officer, Department of Environment, Water, Heritage and the Arts [13/11/2008].



Threatened Species Conservation Act 1995 [NSW]

The objects of the Threatened Species Conservation Act (TSC Act) 1995 are to conserve biological diversity and promote ecologically sustainable development, to prevent the extinction and promote the recovery of threatened species, populations and ecological communities, to protect the critical habitat of those threatened species, populations and ecological communities that are endangered, to eliminate or manage certain processes that threaten the survival or evolutionary development of threatened species, populations and ecological communities, to ensure that the impact of any action affecting threatened species, populations and ecological communities is properly assessed, and to encourage the conservation of threatened species, populations and ecological communities by the adoption of measures involving co-operative management.

The TSC Act includes schedules which list threatened species, populations and ecological communities and key threatening processes.

In a Flora and Fauna Assessment undertaken by Peter Parker Environmental Consultants P/L for land at Evans Head a number of vulnerable species were found within the northern, eastern and western portions of the Aerodrome site, as well as on surrounding land (Figure 5).

Given the presence of threatened species within the western, northern and eastern portions of the site, and the recommendation by the Flora and Fauna consultant for the conservation of the northern and eastern portions of the site, these areas of the site are considered to be inappropriate for future development.

Rural Fires Act 1997

Pursuant to the Rural Fires Act 1997 development consent from a bush fire safety authority may be required for the following development types, as outlined in Section 100B (1) of the Rural Fires Act 1997.

- A subdivision of bush fire prone land that could lawfully be used for residential or rural residential purposes, or
- ▶ Development of bush fire prone land for a special protection purpose. *Special fire protection purpose* means the purpose of the following:
 - (a) a school,
 - (b) a child care centre,
 - (c) a hospital (including a hospital for the mentally ill or mentally disordered),
 - (d) a hotel, motel or other tourist accommodation,
 - (e) a building wholly or principally used as a home or other establishment for mentally incapacitated persons,
 - (f) housing for older people or people with disabilities within the meaning of *State Environmental Planning Policy No 5 Housing for Older People of People with a Disability*,
 - (g) a group home within the meaning of State Environmental Planning Policy (Infrastructure) 2007.
 - (h) a retirement village,
 - (i) any other purpose prescribed by the regulations.



A bush fire safety authority authorises development for the aforementioned purposes to the extent that it complies with standards regarding setbacks, provision of water supply and other matters considered by the Commissioner to be necessary to protect persons, property or the environment from danger that may arise from bush fire.

A person must obtain a bush fire authority before developing bush fire prone land for a purpose referred to in Section 100B (1) of the Rural Fires Act 1997.

Thus any future development of the subject site for a purpose referred to Section 100B (1) of the Rural Fires Act 1997 would require approval from a bush fire authority, as set out in Section 100B of the Rural Fires Act 1997.

Water Act 1912

Pursuant to the Water Act 1912 the state has control of all water both on the surface and under the ground. It is acknowledged that a license may be required under the Water Act 1912 if any structures are to intercept groundwater flows.

Further investigations would need to be undertaken as part of any future development applications lodged for the study area.

State Environmental Planning Policy No 14 – Coastal Wetlands

SEPP No. 14 – Coastal Wetlands (SEPP 14) aims to preserve and protect the coastal wetlands in the environmental and economic interests of the State. Under the policy, activities involving land clearing, levee construction and drainage or filling of land, can only be carried out with the consent of Council and the concurrence of the Director-General of the Department of Planning. In considering a development application the Council and Director General will consider a number of issues such as the environmental effects, proposed measures for rehabilitation, possibility of alternatives and any representations from agencies such as the National Parks and Wildlife Service.

The north western portion of the site contains land designated as SEPP 14 Coastal Wetlands. Clause 7 of SEPP 14 outlines the restrictions on development on land to which the policy applies. Given the Aerodrome site contains SEPP 14 Coastal Wetlands the matters set out in Clause 7 must be considered as part of any future development application for the site. The portion of the site affected by SEPP 14 is considered to be an absolute constraint in terms of future development.

SEPP 55 - Remediation of Land

SEPP 55 – Remediation of Land introduces state-wide planning controls for the remediation of contaminated land. The policy states that land must not be developed if it is unsuitable for a proposed use because it is contaminated. If the land is unsuitable, remediation must take place before the land is developed. The policy makes remediation permissible across the State, defines when consent is required. Requires all remediation to comply with standards, ensures land is investigated if contamination is suspected, and requires Councils to be notified of all remediation proposals. To assist Councils and developers, the Department of Planning, in conjunction with the (then) Environment Protection Authority, prepared "Managing Land Contamination: Planning Guidelines".

Given the past military use of the Evans Head Memorial Aerodrome, and the likelihood of the site having been used for fuel storage in the past, the potential for contamination to occur at the



aerodrome exists. As such a soil contamination assessment would need to be carried out as part of any development application for land within the site.

State Environmental Planning Policy No 71 – Coastal Protection

SEPP No. 71 – Coastal Protection applies to land the whole or any part of which is within the coastal zone. The subject site is located within one kilometre of the open coastline and is therefore within the coastal zone. Thus, the matters for consideration set out in Clause 8 of SEPP No. 71 are to be taken into account by the consent authority when it determines a development application to carry out development on land to which the SEPP applies. The consent authority will either be Richmond Valley Council or the Minister for Planning if the matter is subject to Part 3A of the EP & A Act, 1979.

State Environmental Planning Policy (Major Projects) 2005

This SEPP primarily identifies activities to which the development assessment and approval process under Part 3A of the Act applies and in particular if any of that development is critical infrastructure. If Part 3A applies then the Minister for Planning is the consent authority.

State Environmental Planning Policy (Infrastructure) 2007

This SEPP details a wide range of public infrastructure and facility related development that is to be dealt with under Part 5 of the EP & A Act, 1979 where the proponent is a state or local authority. It also allows for development of surplus government land, identifies issues that must be considered for development in proximity to particular infrastructure and provides for certain consultation with public authorities when development is proposed.

North Coast Regional Environmental Plan

The provisions of the North Coast Regional Environmental Plan will affect any future development of the subject site. The clauses most pertinent to the development of the Aerodrome site include:

Development control—impact of development on agricultural activities
Development control—wetlands or fishery habitats
Development control—natural areas and water catchment
Development control—coastal lands
Development control—coastal hazard areas
Heritage Items, generally
Development control—heritage items of State and regional significance
Development control—heritage items of regional significance
Conservation incentive relating to heritage items
Development in the vicinity of heritage items
Development control—tourism development
Development control—natural tourism areas
Development control – sporting fields or specialised recreation facilities





NSW Coastal Policy

The subject site is located within the coastal zone as the site is within one kilometre of the open coastline. The provisions of the NSW Coastal Policy therefore apply to the subject site, given its location within the coastal zone.

Table 2 of the NSW Coastal Policy outlines the issues to be considered by the consent authority in determining development applications within the coastal zone.

6.3.4 Local Plans and Policies

Richmond River Local Environmental Plan

Pursuant to the Richmond River Local Environmental Plan 1992 (LEP) the majority of the site is zoned 1(b1) Rural (Secondary Agricultural Land). The SEPP 14 Coastal Wetland in the north western portion of the site zoned 7(a) Environmental Protection (Wetlands). The portion of the site immediately south and west of the existing industrial area contained by the south eastern portion of the site is zoned 4(a) Industrial. The land to the north and south of the 4(a) Industrial land is zoned 2(v) Village (See Figure 6).

The provisions of the 1(b1), 2(v), 4(a) and 7(a) zones are outlined in Clause 9 'Zone Objectives and Development Control Table' of the LEP.

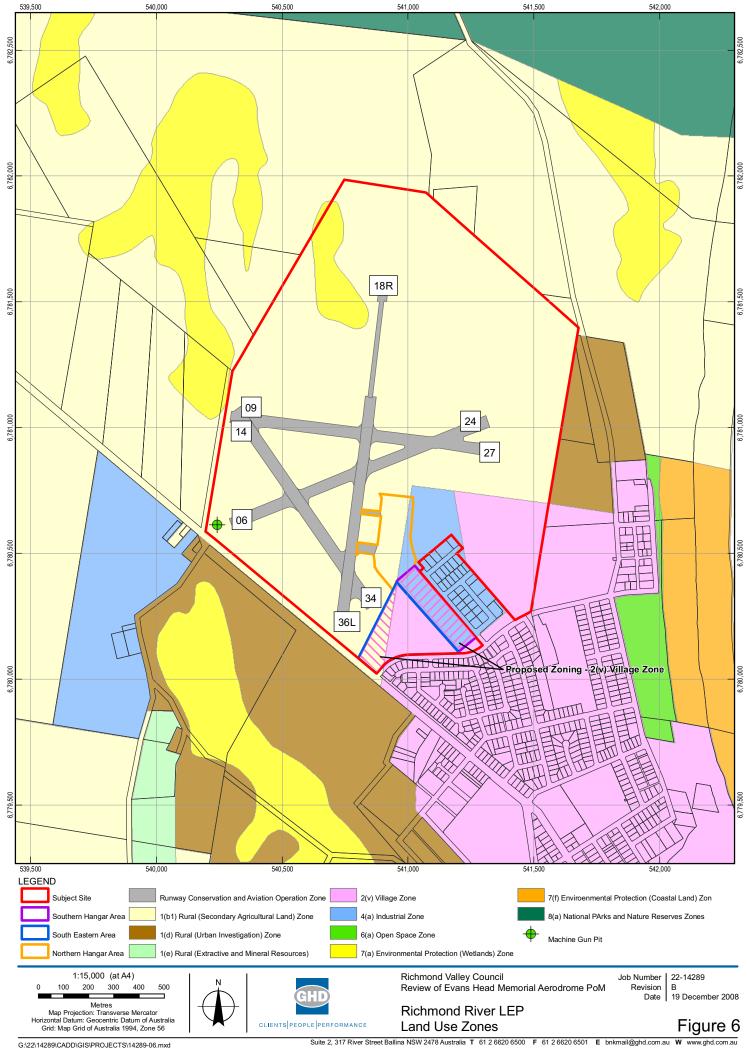
To facilitate future development, appropriate to the environmental and heritage significance of the aerodrome rezoning of the aerodrome may be required.

Given the presence of threatened flora and fauna within the northern and eastern portions of the site (see Peter Parker Flora and Fauna Assessment) it is recommended that these areas be rezoned to Zone No 7(c) Environmental Protection (Flora and Fauna) Zone, with the exception of the existing 7(a) zone which would remain as is.

The Northern Hangar Area (in the location of the existing Bellman Hangar) would be suitable for air park development or air tourism, with specific controls on this area to ensure the intensity of use is compatible with aviation activities.

Opportunities also exist to investigate the rezoning of the Southern Hangar Area (including the Council Works Depot) from 4(a) Industrial to 2(v) Village to facilitate development that is in keeping with the heritage recommendations for the site and consistent with the constraints affecting the site including ANEF Contours and OLS requirements. In this area it would be appropriate for larger buildings reflecting the 'hangar aesthetic' of the zone including general orientation, spatial arrangement and the use of compatible external building materials.

Prior to any statutory amendment being made to the Richmond River Local Environmental Plan it is likely that DIPNR would require a Local Environment Study to be undertaken for the land, as the site is located within the NSW Coastal Zone. As part of any rezoning of the land it would also be essential to investigate the social and economic implications of a loss of industrial land within Evans Head. Any amendment made to the Richmond River LEP would also been to be done so in accordance with Section 83 and 84 of the Heritage Act 1977 [NSW].





Development Control Plan No 10 - Evans Head 2004

The purpose of the Development Control Plan No 10 is to provide for the planned growth of Evans Head by identifying both development constraints and development opportunities and to outline a strategic sustainable approach to the future growth of Evans Head.

The DCP identifies the portion of the aerodrome site currently zoned 4(a) Industrial as being with the Control Plan Area I1 – Industrial Estate (Airfield) (Figure 8).

The DCP states:

"It is the intention of this control plan area to accommodate industrial development that does not have a substantial adverse impact upon the amenity of the surrounding area by way of industrial emissions (including noise) or the generation of excessive heavy vehicle traffic. Such development to be in the form of general, light and service industry but not hazardous, noxious or offensive industries and heavy industries.

For those site adjoining the airfield, Council will encourage the establishment of airfield industrial and associated activities. It is also intended that commercial/retail and educational development only be allowed where it relates to industrial or airfield activities."

In order to ensure consistency with Development Control Plan No. 10 which states that Council will encourage the establishment of airfield industrial and associated activities at the aerodrome, Council will make available its land holdings on Memorial Airport Drive for the purpose of airfield industrial and associated activities.

If the existing Council Depot were to be rezoned to 2(v) Village as discussed above, the provisions of the DCP relating to Control Area I1 would need to be amended.

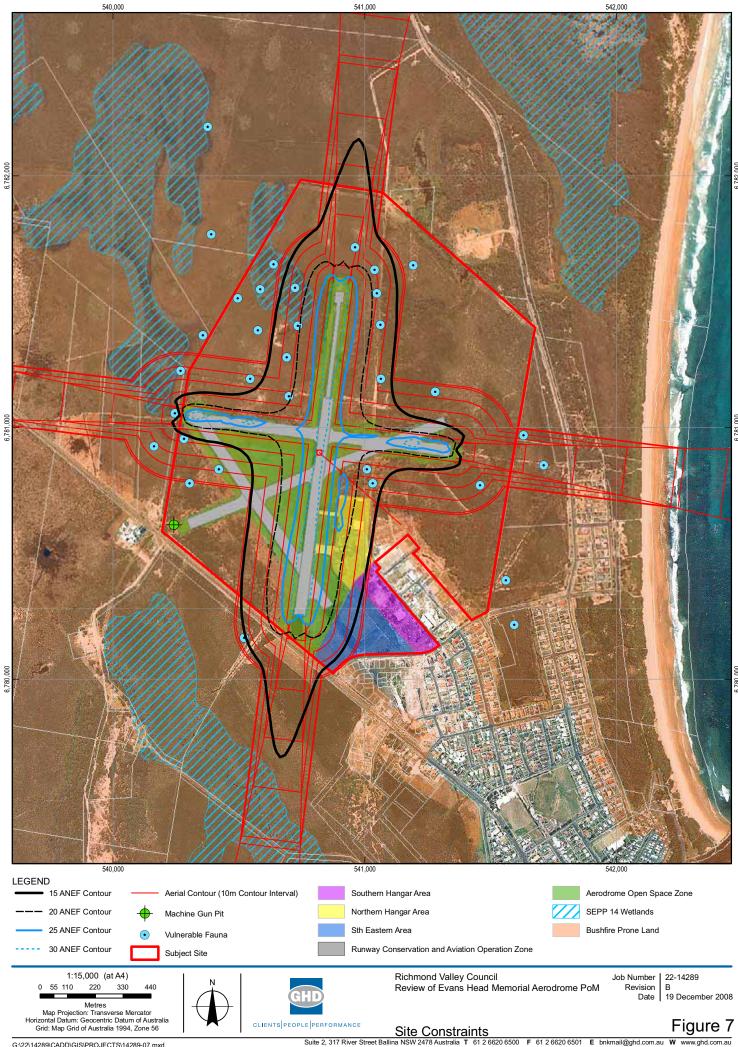
Bush Fire Prone Land Mapping

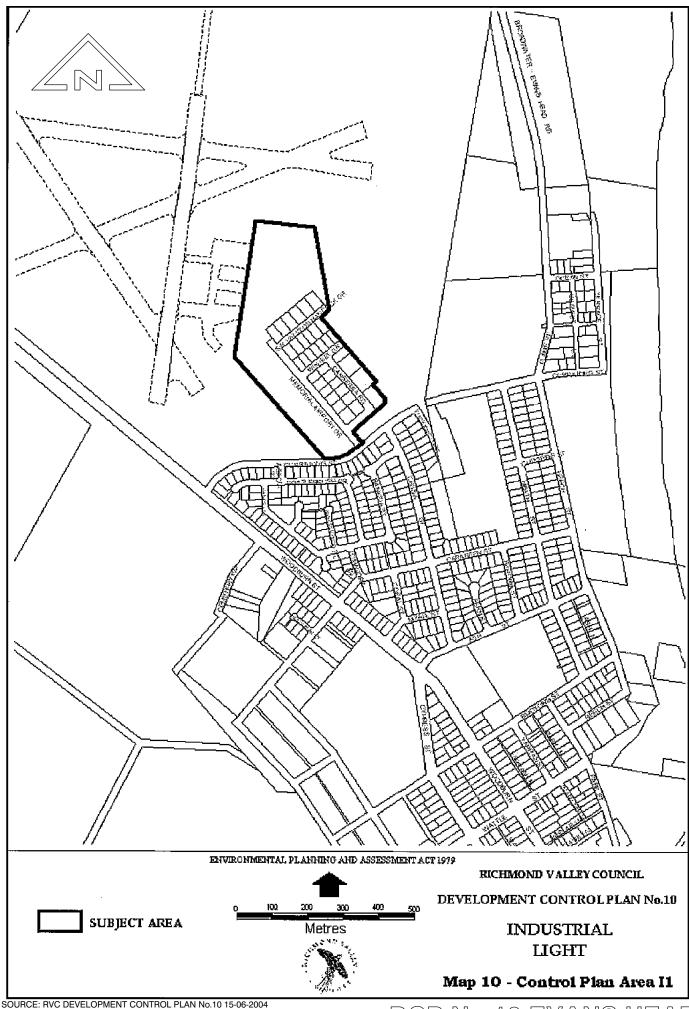
The Richmond Valley Council Bush Fire Prone Land Maps identify the majority of the aerodrome site as being bush fire prone land, by way of either vegetation category of bushfire prone land buffer.

The implications of this mapping is that the only portion of the site not considered to be bushfire prone is that land within the south eastern corner of the site, as illustrated in Figure 9. Any development application submitted for the site for a purpose outlined in Section 100B of the Rural Fires Act 1997 would be subject to the provisions of a bushfire hazard assessment.

6.4 Physical Constraints

The overall constraints of the site are shown in Figure 7.



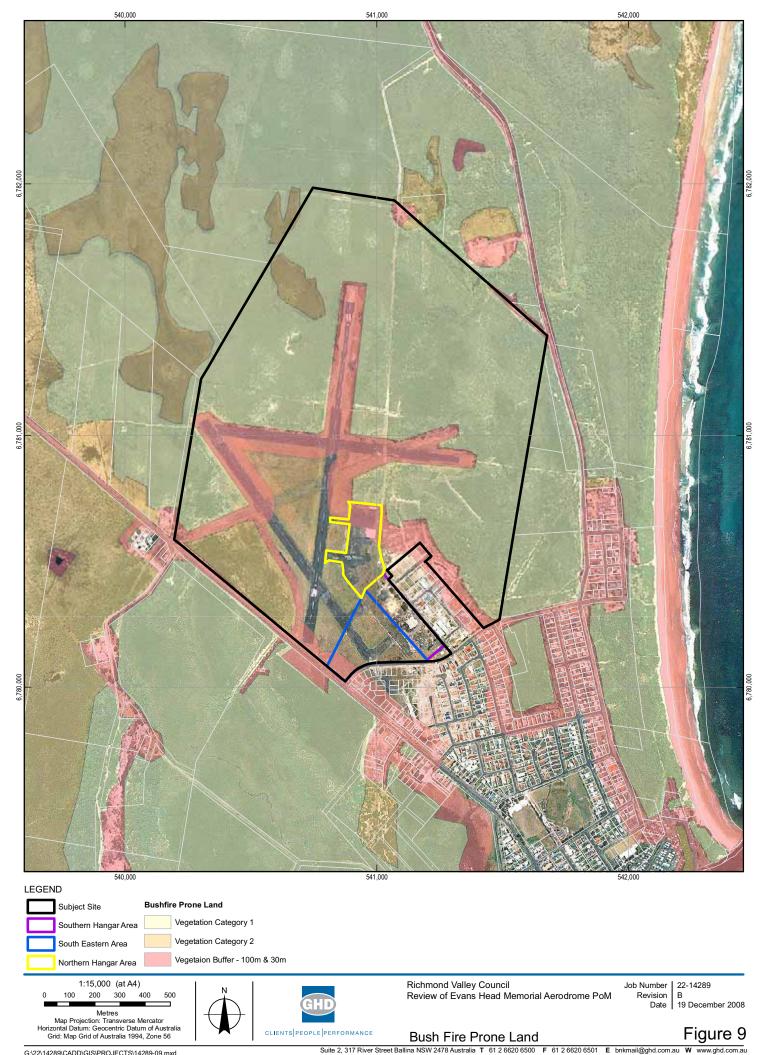




GHD Pty Ltd

2/115 West High Street Coffs Harbour NSW 2450 PO Box 1340 Coffs Harbour NSW 2450 T 61 2 6650 5600 F 61 2 6652 6021 E cfsmail@ghd.com.au www.ghd.com.au

DCP No.10 EVANS HEAD CONTROL PLAN MAP AREA I1





6.4.1 Heritage Values

Heritage zoning reflects opportunities and constraints based on the heritage sensitivity of areas within the aerodrome, and the conservation needs and compatible uses that might apply to those areas.

The zoning is reflected in Figure 10.

The zoning is based on the significance of the place and its components, on the condition of fabric reflecting that significance, and the resulting potential compatible uses. The zones identified (and their equivalent area identifier) are the:

- Hangar Conservation and Aviation Operation Zone (Northern Hangar Area);
- Runway Conservation and Aviation Operation Zone;
- Aerodrome Open Space Zone;
- Southern Hangar / Works Depot Zone (Southern Hangar Area (Council Works Depot)); and
- Southern Runway Zone (South Eastern Area).

The *Hangar Conservation And Aviation Operation Zone* consists of the surviving Bellman hangar, and the sites of five adjacent hangars together with the surrounding tarmac areas.

- ▶ The Bellman Hangar is to be conserved by means specified in a supplementary conservation plan for the building.
- The hangar sites may be used as sites for new buildings, designed and oriented to respect the 'hangar aesthetic' of the surviving hangar and the WWII visual character of the hangar complex.
- ▶ The tarmac apron areas surrounding the hangar sites are to be retained as hardened areas without new buildings, and maintained, repaired or reconstructed as necessary to support new uses in buildings constructed on the adjacent hangar sites.

The *Runway Conservation And Aviation Operation Zone* consists of the four runways and immediately adjacent cleared grass strips and drainage system, each runway strip generally being approximately 46m wide, as well as the two taxiways off runway 18/36.

- All runways are regarded as culturally significant, and should be conserved as features in the aerodrome landscape.
- Where runways are to be maintained for aviation operations the strips are to be maintained to their current level.
- Where aviation operations are not maintained, the strips need to be managed as mown grass landscape elements, with no requirement to maintain the sealed surface to an operational condition.
- ▶ Taxiways off runway 18/36 should be maintained as landscape elements, surfaced as required to the extent necessary to service ongoing aviation uses (see also the requirements for the Hangar conservation and aviation operation zone).
- The principles also apply to the alignment of the southern end of runway 14/32 and the two taxiways off it, within the *Southern runway zone* (see below).

The **Aerodrome Open Space Zone** consists of the existing open space between and adjacent to the runways. The landscape of this open grassland should be maintained to conserve the historic



and cultural landscape values of the place. This zone stops at the boundary of the *Southern runway zone*.

- The open space zone should retain a low vegetated ground cover, either by mowing or species selection.
- Proposals to irrigate the western part of the zone should judged (apart from other environmental considerations) on both the impact on the retention of an open landscape, and the potential impact of irrigation on bird-risk to aviation uses.

The **Southern Hangar / Works Depot Zone** consists of the sites of eleven former hangars, which have been extensively disturbed by post-WWII activities, to the point where very little evidence of their existence is discernable on the ground. The conservation opportunities in this zone are mainly interpretative, as appropriate redevelopment could reflect and help interpret the WWII scale and configuration of the aerodrome development.

- Retention of the Works Depot hangar is not essential for conservation of the heritage values of the aerodrome.
- Future development on the area formerly occupied by hangars should reflect the orientation, scale and spatial arrangement, and materials texture of the WWII hangar complex, without slavishly recreating hangar forms. Sympathetic building alignment, scale and materials and/or colours, and street and plantings orientation, would help achieve this objective.

The **Southern Runway Zone** consists of the southern section of Runway 14/32 and associated taxiways, disturbed to varying degrees by post-2000 activities which also saw the extreme southern extension of the runway subsumed under housing and road development. The heritage significance in this zone relates to the role of the runways in the aerodrome landscape (see also *runway conservation and aviation operation zone* above), but redevelopment for new uses could be allowed while still conserving that value.

▶ The alignment of runway 14/32 and the two taxiways off it should be retained in some clearly recognisable form in the landscape in any subsequent land use. This might include retention of open space, alignment of roads and adjacent building development, landscape treatment or some other approach that stressed the lineal nature of the runways and taxiways, visible from both ground level and the air.

6.4.2 Flora and Fauna

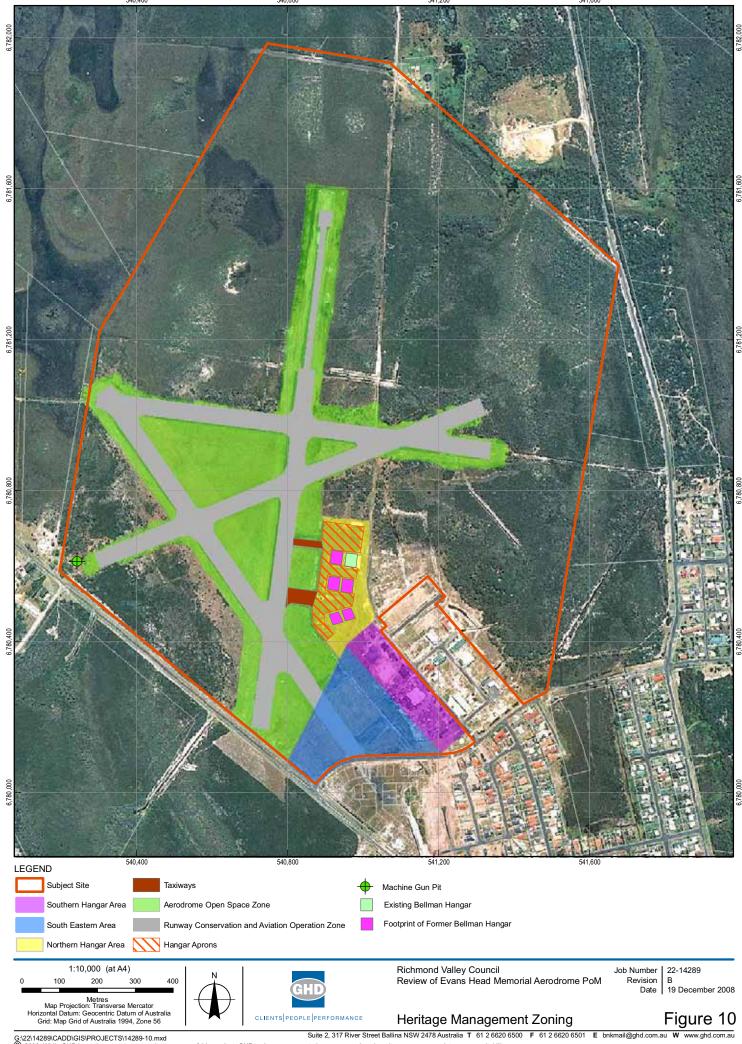
A flora and fauna assessment undertaken by Peter Parker for the site recommended that: 'The northern half of the airfield be protected from further development due to its similar conservation values to land within Broadwater National Park'.

At its meeting on 21 May 2002, Richmond Valley Council concluded, on the basis of Peter Parkers Environmental Assessment for the Aerodrome site, that:

▶ The northern half of the airfield would be protected from further development due to its similar conservation values to land within the Broadwater National Park.

The implications of the environmental assessment and Council's decision is that the northern portion of the site is to be protected from further development due to the natural conservation values of this area.

Figure 11 illustrates the portions of the site to be conserved due to natural conservation values.







6.4.3 State Environmental Planning Policy No. 14 Coastal Wetland No. 132

The wetland in the northern portion of the site is gazetted SEPP 14 Wetland No. 132 (Figure 11).

SEPP 14 Wetland No. 132 is protected by State Environmental Planning Policy No. 14, and should be conserved because it is an important natural environment.

6.4.4 Bush Fire Prone Land

The majority of the site is considered to be bushfire prone land (Figure 9).

Any development application submitted for the site for a purpose outlined in Section 100B of the Rural Fires Act 1997 would be subject to the provisions of a bushfire hazard assessment.

6.4.5 ANEF Contours

Australian Noise Exposure Forecasts (ANEF)

The ANEF system described in AS2021 is the only methods of controlling land use planning at all but two minor Australian aerodromes. It is not used to regulate aircraft operations but rather to report on the effects of those activities.

The Australian Standard AS2021 provides recommended land use compatibility as shown in Table 7.

Table 7 AS2021 table of Building Site Acceptability Based on ANEF Zones

Decitation of Trans	ANEF Zone of Site			
Building Type	Acceptable	Conditional	Unacceptable	
House, home unit, flat, caravan park	Less than 20 ANEF	20 to 25 ANEF	Greater than 25 ANEF	
Hotel, motel, hostel	Less than 25 ANEF	25 to 30 ANEF	Greater than 30 ANEF	
School, university	Less than 20 ANEF	20 to 25 ANEF	Greater than 25 ANEF	
Hospital, nursing home	Less than 20 ANEF	20 to 25 ANEF	Greater than 25 ANEF	
Public building	Less than 20 ANEF	20 to 30 ANEF	Greater than 30 ANEF	
Commercial building	Less than 25 ANEF	25 to 35 ANEF	Greater than 35 ANEF	
Light industrial	Less than 30 ANEF	30 to 40 ANEF	Greater than 40 ANEF	
Other industrial	Acceptable in all ANE	zones		

The effect of aircraft noise can range from minor to serious depending on its level, duration, frequency, content and the sensitivity of the person affected. The ANEF system is an approved method of noise assessment and displays noise exposure levels in the vicinity of the aerodrome.



The ANEF is constructed using a computer model to generate contours of equal noise exposure level. It is normal to show contours of 20, 25, 30, 35 and 40 ANEF units where applicable. It is based upon the:

- Intensity, duration, content, and spectrum of the sound;
- Forecast aircraft types and movements on various flight paths; and
- Average daily distribution of aircraft take-offs and landings.

The ANEF is used to provide guidance for land use planning. The ANEF contours indicate the suitability of various land uses near an aerodrome. Values higher than 25 ANEF are considered incompatible with residential development, whilst areas below 20 ANEF are considered acceptable for residential development. Between 20 and 25 ANEF residential development should only be permitted with the incorporation of suitable noise reduction features. The boundary of the southeastern area which is currently zoned residential 2(v) is approximately 60-70 metres outside the 20 ANEF contour (see Figure 12). According to the Australian Standard AS 2021, development, which is compatible with the area's existing zoning, would be permissible.

A copy of the Draft ANEF Report prepared for the Evans Head Memorial Aerodrome has been included in Appendix E. Aircraft identified in the Draft ANEF Report (GHD 2005) undertaken for the Evans Head Memorial Aerodrome are outlined below.

Ambulance Aircraft types

- ▶ Beech 200 turbo-prop study name AB200 INM equivalent DHC6
- Westpac helicopter study name AWPAC INM equivalent S70
 - (Note: This aircraft was modelled as a military Black Hawk as that was the only data available for a large twin engined helicopter.)

Emergency Aircraft types

- ▶ CASA 212 turbo-prop study name ECA212 INM equivalent DHC6
- ▶ Kiowa or Bell 206 study name EB206 INM equivalent B206

Charter Aircraft types

- ▶ Beech 200 turbo-prop study name CB200 INM equivalent DHC6
- ▶ Piston engined light twin study name CB58P INM equivalent BEC58P
- Single engine with variable prop study name CGAV INM equivalent GASEPV

General Aviation Aircraft types

- ▶ Piston engined light twin study name GB58P INM equivalent BEC58P
- ▶ Single engined variable pitch prop study name GGAV INM equivalent GASEPV
- ▶ Single engined fixed pitch prop study name GGAF INM equivalent GASEPF
- Ultra light study name GUAF INM equivalent GASEPF

Great Eastern Fly-In Aircraft Types

Associated with the Great Eastern fly-in are operations by significant range of 'War-bird' aircraft including Antonov, Boomerang, Catalina, Constellation, Fiat G-59, MIG15, Mustang, Spitfire, T-6 Harvard, T-28 Trojan, Winjeel and Wirraway. Indicative types modelled were Vampire, Spitfire,



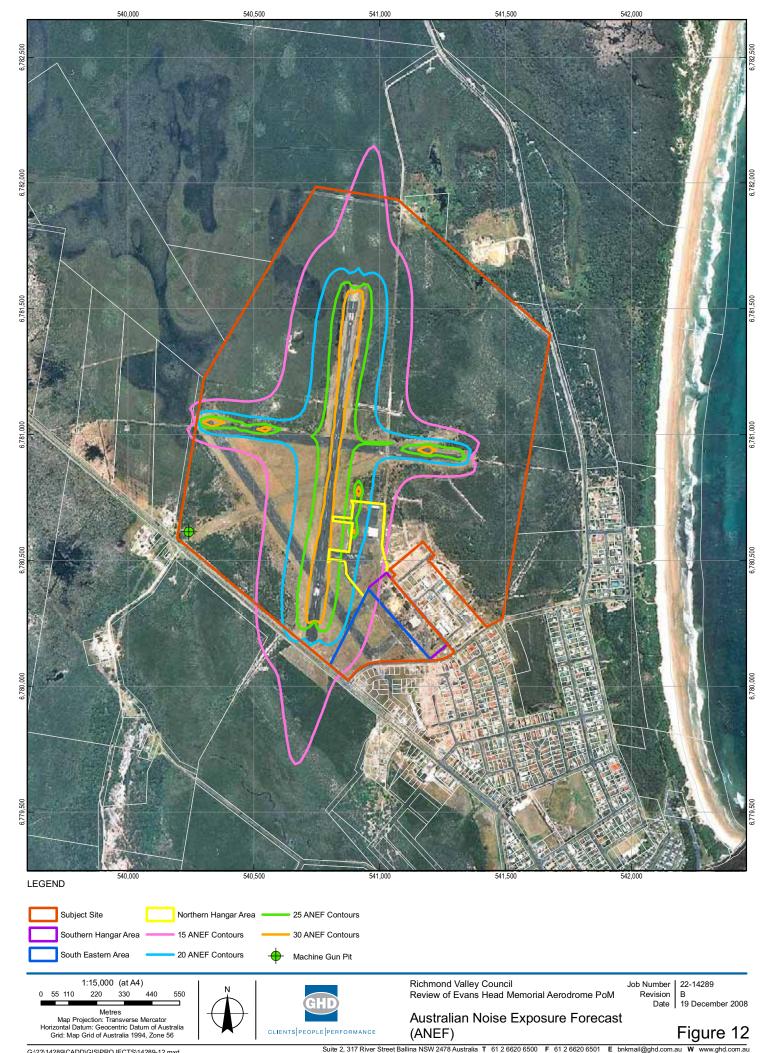
Wirraway and Tigermoth aircraft. The noise characteristics (NPD curves) selected were the closest available in the INM database and the aircraft performance characteristics (fixed point profiles) were as supplied by the Temora Aviation Museum for the preparation of the Temora 2023 ANECs;

- ▶ Large piston engined twin study name FDC3 INM equivalent DC3
- ▶ Piston engined light twin study name FB58P INM equivalent BEC58P
- ▶ Single engined variable pitch prop study name FGAV INM equivalent GASEPV
- ▶ Single engined fixed pitch prop study name FGAF INM equivalent GASEPF
- Ultra light study name FUAF INM equivalent GASEPF
- Vampire study name FVAMP INM equivalent F8
- Spitfire study name FSPIT INM equivalent GASEPV
- ▶ Wirraway study name FWIRR INM equivalent DHC-2
- ▶ Tigermoth study name FTIG INM equivalent GASEPF

Figure 12 shows the extent of the Draft 15 and 20 ANEF contours at the Evans Head Memorial Aerodrome.

It is also important to note that the current ANEF Report is a revised edition of the initial ANEF Report. The initial ANEF Report was required to be revised due to:

- A lack of community consultation with regard to the Report;
- Community Opposition to the shortening of the runways; and
- ▶ The number and types of planes identified in the initial Report was not accurately accounted for.





6.4.6 The Obstacle Limitation Surfaces (OLS)

The OLS define the lower limits of airspace, centred on the aerodrome and/or associated with the runways, which is required to allow the safe manoeuvring of aircraft on arrival or departure from the aerodrome (See Figure 13).

Obstacle Limitation Surfaces are established to ensure a satisfactory level of safety. These surfaces normally extend beyond the boundary of the airport and therefore require protection by the enactment of Zoning Regulations or Legal Instruments which will prohibit the erection of structures which would violate any of the defined plane surfaces. Outside the defined plane surfaces the erection of structures is permitted subject to all other planning instruments.

6.4.7 Unexploded Ordnance (UXO)

The letter from the Department of Defence to Council (dated 26 April 2000) indicates that Evans Head Aerodrome is not recorded by Defence as a site affected by UXO. Based on this information, there is no evidence to suggest that a full UXO contamination site survey is necessary.

Notwithstanding the unlikely presence of UXO contamination, there is a low risk from possible unrecorded burial pits which may contain ammunition produce or other potentially hazardous items. Accidental excavation of such a site, although unlikely could present a risk to construction workers or the public. Also, the previous findings of small arms projectiles, although not a latent hazard would suggest that there is a possibility of live small arms ammunition being present in the area, either lying on the surface, just below the surface or buried in unrecorded pits. To mitigate these risks, it is recommended the following precautions be taken prior to any site development:

- ▶ A thorough visual search of the area to check for any ammunition or produce. This can be performed by unskilled labour, adequately supervised by a UXO specialist and would take less than a day.
- Undertake a sub-surface search of all sites to be excavated prior to commencing digging in order to identify any unrecorded burial sites. This should be performed by a UXO specialist.

6.5 Owner requirements and aspirations

Meeting of Richmond Valley Council, May 2002

At its meeting on 21 May 2002, Richmond Valley Council concluded, on the basis of environmental reports, that:

- 1. The northern half of the airfield would be protected from further development due to its similar conservation values to land within the Broadwater National Park; and
- 2. The area within the south-western section would be developed for irrigation purposes to cater for effluent disposal from the upgraded sewerage plant during dry periods, subject to an amelioration plan that considered, among other things, the impact on aviation activity of an increased bird population. (A subsequent item indicates this issue was to be addressed in a species impact statement forming part of the Sewerage Treatment Plant upgrade.)

⁶⁰ Minutes of Richmond Valley Council Executive Committee meeting held on Friday 10 May 2002—C.470-02.



This meeting also reported on public consultation of the pre-draft Evans Head Strategy, in which 60% of the 50 submissions received sought retention of the airfield and its heritage significance, backed up by a petition with 1,800 signatures. The Council concluded that:

'While there was little support for residential development, in fact more objection to residential development was received than support. In any event, having regard for the findings of the previously identified environmental investigation and the need to dispose of effluent on the south western section of the airfield, residential development on the airfield is not an option."

Heritage Listing Process

During the consultation process, the Evans Head Memorial Aerodrome Committee Inc (EHMAC) submitted, among other things, that the airfield land should be used for aviation associated industry. Council comment on this was that:

Promotion of aviation industry is seen as an important element to the sustainability of any aviation activity at the Evans Head Airfield which has been reflected in the pre-draft Development Control Plan No. 10.'

In response to the NSW Heritage Council's citation for the place, Council concluded that:

'It was agreed that the airfield and associated buildings has strong historical and cultural links for Evans Head, however to maintain these links there needs to be operational aviation activity and/or compatible land use that keeps the historical/cultural aspect sustainable in the future.'61

Council identified a series of works that should be undertaken at the Bellman Hangar to ensure its conservation. Council sought funding from the NSW Heritage Office to undertake the works, however funding was not forthcoming. As a result these works were not carried out, and the hangar remains in a state of disrepair.

Richmond Valley Council commissioned a report by AOS Airport Consulting on the airfield's capacity and use limitations, the present and likely contribution to the regional economy, and the potential of the airfield to cater for Regular Public Transport (RPT) aviation.

RPT aviation was not considered a viable option, given the current and projected pattern of regional air traffic use. ⁶² It was concluded that the airfield should be focussed on light aircraft providing:

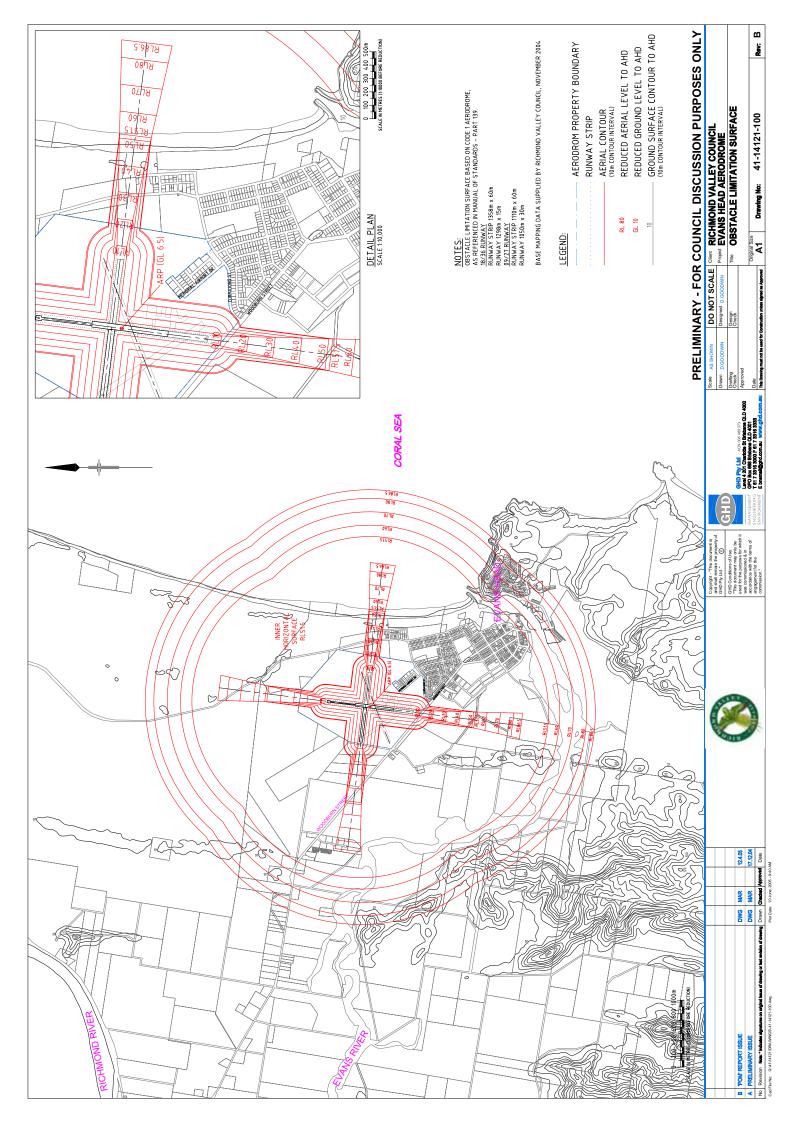
- Training facilities;
- Charter (joy rides etc);
- Sport and recreation aviation; and
- Private use.

The RAAF has indicated that it has no current or future need for use of the aerodrome.⁶³

⁶¹ Minutes C.470-02 Item 3.

⁶² Based on AOS Airport Consulting Draft report April 2002, as reported in Minutes of Richmond Valley Council Executive Committee meeting held on Friday 10 May 2002—C.470-02: item 4.

⁶³ Letter Air Commodore G.D. Shepherd to P.T. Muldoon, Richmond River Shire Council, 8/3/1999.





6.5.1 Relocation of Former Aerodrome Structures

Council owns at least two timber structures formerly associated with RAAF occupation of the aerodrome—the 'tuckshop', now stored at the Council works depot at the aerodrome, and the Scout Hall located in Mangrove Street, Evans Head, formerly part of the RAAF wireless station near Doonbah. Other huts are located at Camp Koinonia, and should any of these structures become available Council should consider acquiring them and return them to the Aerodrome site.

The repositioning of returned structures is sensitive. They should not be located as free-standing structures in the zone formerly occupied by hangars, but could be located in the area to the east formerly occupied by timber huts. Alternatively, if the Bellman hangar is utilised as a museum facility, a selection of huts might be housed within it as part of the interpretative function and for related uses.

The premises of Evans Head Cabinet Makers at 11-15 Canberra Road, and the shower/toilet blocks opposite the Bellman hangar, are the last remaining WWII hut structures remaining on their original sites.

6.6 Opportunities

6.6.1 Compatible Land Uses

Hangar Conservation and Aviation Zone

The physical attributes of the Hangar Conservation and Aviation Zone (Northern Hangar Area) are such that it is constrained to an extent by the heritage conservation values associated with the aerodrome. The heritage assessment has determined that within the Hangar Conservation and Aviation Zone there is surviving significant evidence of the hangar locations and associated tarred aprons. This significant evidence leads to the following development controls for future development of this zone:

- Any future buildings in this area be contained within the footprints of the former hangars, and should not entail the removal or destruction of the apron areas (though resurfacing may be permitted if the new use requires adjacent hard paving).
- The form, orientation, external building materials and as far as possible the scale of any buildings located within the Hangar Conservation and Aviation Zone should be sympathetic to those of the surviving Bellman hangar, the objective being to echo the rhythm and scale of the WWII built form and evoke aviation associations. The mixed built form and materials of the adjacent industrial area is not appropriate within the hangar precinct.
- No building should be permitted west of the alignment of the western walls of the former hangars.

The flora and fauna assessment undertaken for the aerodrome site did not identify any significant flora and fauna within the Hangar Conservation and Aviation Zone. The northern portion of this zone is classified as being bush fire prone land pursuant to Richmond Valley Council Bush Fire Prone Land Maps.



Development Opportunities

A Memorial Garden would be appropriate within the Hangar Conservation and Aviation Zone. The area to the south of the existing hangar area is considered to be a suitable location for the Memorial Garden.

An Air Park development is one potential type of future development that may be able to be accommodated within the Hangar Conservation and Aviation Zone of the Evans Head Memorial Aerodrome.

An Air Park may include:

- ▶ Allotments of 1000-1500m² with separate dwelling and hangar or Air Park Chalet 400-700m² dwelling integrated into hangar.
- Other potential options within an air park are:
 - Aerodrome accommodation;
 - Warbird Museum;
 - Related industrial support activities; and
 - Flight training centre.

Benefits of an Air Park

An Air Park would:

- Compliment and encourage continued aviation use at the aerodrome;
- ▶ Provide unique development to the region encourage tourism, as well as additional residents; and
- ▶ Facilitate and encourage aviation events at the airfield such as 'Great Eastern Fly In'.

An Air Park development should be subject to the heritage agreement, as well as appropriate conservation contributions, and stipulations for aviation use. An airpark should also be kept in single ownership to avoid piecemeal selling off for non-aviation uses.

Southern Runway Zone

The physical attributes of the Southern Runway Zone (South Eastern Area)⁶⁴ are such that it is constrained to an extent by the heritage conservation values associated with the aerodrome. The heritage assessment has identified that this area (immediately south-west of the former hangar area) containing the surviving southern taxiway and southern end of runway 14/32, equating to Councils potential development site 3, may be developed for residential purposes in accordance with its existing 2(v) zoning. This significant evidence leads to the following development controls for future development of the Southern Runway Zone:

- ▶ The heritage assessment states the alignment of runway 14/32 and the two taxiways off it should be retained in some clearly recognisable form in the landscape in any subsequent land use. This would include:
 - The retention of open space;
 - Alignment of roads and adjacent building development; and

⁶⁴ The exact boundaries of the Southern Runway Zone have been confirmed by an identification survey by RVC (see Appendix I).



- Landscape treatment or some other approach that stressed the lineal nature of the runways and taxiways, visible from both ground level and the air.
- Any buildings associated with development in this zone should be located as close to existing residential development as possible to create a buffer between it and the aerodrome in order to minimise any impact from aircraft noise despite the fact that the area is well outside the 20 ANEF contour. Furthermore any buildings proposed should be treated with noise dampening devices such as insulation and double glazing.
- A fly neighbourly agreement (see Appendix D) would also be established to reasonably regulate aircraft noise. This agreement would need to be negotiated between those conducting business at the airfield, EMAC, the local community and RVC. The agreement would be widely circulated and a notice inserted in appropriate publications to advise that a fly neighbourly agreement is in force at Evans Head.
- Buildings should be low in nature so as not to conflict with the OLS and to minimise impacts on sight lines.
- ▶ The form, orientation, external building materials and as far as possible the scale of any buildings located within the Southern Runway Zone should be sympathetic to the existing landscape which includes the southern end of Runway 14/32 and the two taxiways off it, the objective being to echo the lineal nature of the aerodrome.

The flora and fauna assessment undertaken for the aerodrome site did not identify any significant flora and fauna within the Southern Runway Zone of the site. The Richmond Valley Council Bush Fire Prone Land Maps classify a small portion of the southern part of the Southern Runway Zone as being within the vegetative buffer for the vegetation to the south of Woodburn Road. However the majority of this area is not considered to be bush fire prone land.

Development Opportunities

The Southern Runway Zone is considered to be appropriate for residential purposes, given the recommendations of the heritage consultant and its current 2(v) zoning pursuant the RRSC LEP 1992. However any development of this area should be subject to appropriate development controls which protect the continued use of the aerodrome for aviation purposes.

The site's aviation history should be reflected in any proposed development for this area. A development proposal would need to be accompanied by a Heritage Impact Statement and the development application would require approval from the NSW State Heritage Office.

Southern Hangar / Works Depot Zone

The physical attributes of the Southern Hangar / Works Depot Zone (Southern Hangar Area)⁶⁵ are such that it is constrained to an extent by the heritage conservation values associated with the aerodrome. The heritage assessment states that future buildings in this zone should be required to reflect the general orientation, spatial arrangement and compatible external building materials and where possible the scale of the former hangars, though the location of new buildings should not necessarily be limited to former hangar sites.

The objective is to be sympathetic to the Hangar Conservation and Aviation Zone and the WWII history of the site, and to differentiate this area from the mixed built form of the industrial estate to

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⁶⁵ The exact boundaries of the Southern Hangar / Works Depot Zone have been confirmed by an identification survey by RVC (see Appendix I).



the east. This significant evidence leads to the following development controls for future development of the Southern Hangar / Works Depot Zone:

- ▶ If the potential development of the Southern Runway Zone is extended to include this area and the Council's Works Depot, the most appropriate use of this area would be to allow for larger buildings more appropriate with interpreting the 'hangar aesthetic' of the zone.
- Small-scale development should not be permitted in this area as it would remove any opportunity to interpret the WWII history and form of the site.

The flora and fauna assessment undertaken for the aerodrome site did not identify any significant flora and fauna within the Southern Hangar / Works Depot Zone. The Richmond Valley Council Bush Fire Prone Land Maps do not classify the Southern Hangar / Works Depot Zone as being bush fire prone land.

Development Opportunities

The Southern Hangar / Works Depot Zone is considered to be appropriate for light industrial or residential use. However development proposed for this area should include large buildings that reflect its hangar aesthetic.

Future of the Council Works Depot Hangar

The Council's Works Depot is said to have been one of the Evans Head hangars dismantled and removed to Coffs Harbour airport after the war, and then brought back to Evans Head in the late 1970s or early 1980s. No documentation has as yet been located to verify the details. The hangar has been repositioned on an available hangar base on the aerodrome, and is not necessarily on its original site. While the hangar has been substantially modified, it still retains the key characteristics of the Bellman hangar design, and is in good condition.

The Council is planning to relocate its works depot functions, and the hangar would become vacant. Options for its future might include incorporation of new uses related to the aviation and conservation objectives for the aerodrome including relocating the hangar to a hangar base in the Hangar Conservation and Aviation Zone (Northern Hangar Area). A full consideration of the options should be undertaken in the context of this Plan of Management and planning for the industrial area to the east before any decision is taken to remove the hangar. If after consideration, demolition is the agreed action, components of the hangar would be able to be used in the conservation of the surviving Bellman hangar, replacing severely decayed elements, such as doors and selected frames.

Condition of the Surviving Bellman Hangar

The surviving Bellman hangar should be conserved. This would entail preservation and restoration of some building material, and the removal and reconstruction of elements corroded to the point where their structural integrity is compromised. The hangar may require adaptation to meet current structural standards for public access.

Adaptation may entail the introduction of additional structural members, which should be located and attached as far as possible to avoid diminishing the significance of the original structure or hiding it from view. Other adaptation work may be required to provide services for new uses. Much of the adaptation work may be work satisfying the Standard Exemptions from approval under s. 57(1) of the Heritage Act, in relation to repairs. However, the scale of the works potentially



involved and the impact on the surviving fabric of the hangar is likely to require a full IDA approval process.

An engineering assessment (Appendix F) carried out as part of the preparation of the Plan of Management indicated that the end frames and the bases of many other frames are heavily corroded and pose a safety risk, and the cladding is in need of repair. While detailed costings have not been developed, options for the conservation of the building include replacement of corroded elements, possibly drawing on materials from the Council Works Depot hangar.

The relocation of Bellman Hangars from Dubbo, subject to the owner's agreement could be explored as an option for the site.

6.6.2 Interpretation

Interpretation is an important component of any heritage site. The heritage values of the site are enhanced by its interpretation. Without understanding its place in history the value of the site is diminished.

The objectives of the interpretation study are to foster an understanding of the site and to attract people to visit and to learn about the site. This in turn may attract additional tourism investment.

The opportunity here is to develop an active school-user group. This could be accomplished in several ways:

- Heritage Walk;
- Website:
- CD-ROMs;
- Education Packs;
- Partnership resource development; and
- Well-planned and resourced one-day field trips which target specific areas of the curriculum.

A Heritage Walk should be developed on the Aerodrome. The Heritage Walk would extend from the intersection of Currajong Street and Memorial Airport Drive, north east along Memorial Airport Drive, incorporating the existing Bellman Hangar and proposed Memorial Gardens. The Heritage Walk would then extend southwards along the western boundary of the Southern Runway Zone, to Woodburn Road and then along Woodburn Road to the Machine Gun Pit.

A quality, dedicated website could be developed on the Aerodrome which would include educational resources across the curriculum. The website could make available tourist information, info on the local area, access details for driving to the site, walking, cycling and historical and technical information. An important part of the website would be an education section which would provide the following:

- Database of historical images, including photographs, film footage if available and graphics;
- ▶ Database of documents on the Aerodrome and/or hyperlinks to websites of other institutions which may have information on the Aerodrome or similar Aerodromes in Australia:
- Database of those who worked and trained at the aerodrome;
- Information on indigenous use of the area both before Evans Head was proclaimed and during the contact period and beyond;



- Statistical and technical/engineering information on the Aerodrome including comparisons with other similar Aerodromes;
- School excursion information relevant to the Aerodrome;
- A possible 'virtual guided tour' of the Aerodrome, incorporating district views and locating the it in its regional context; and
- Downloadable curriculum resources including excursion programs, developed for students and teachers in conjunction with DET using the Aerodrome in relevant Key Learning Areas.

The advantages include:

- Internationally and nationally accessible, particularly to schools in country areas and far west of NSW who may not be able to visit the site;
- Increase of user groups and education outreach even if logistical factors make it difficult for school groups to visit the site;
- Emphasis on contact history in the syllabus could be a great opportunity for increased interpretation of the indigenous and contact history of the area;
- Websites can also be regularly updated in response to curriculum needs.

The disadvantages include:

- No direct financial return to the creators and maintainers of the site except through subscription or advertising;
- Need to be regularly updated and maintained; and
- Students may use the site in the class but not visit the Aerodrome as a group. If visitor numbers are important then this may be a disadvantage.

An alternative is to develop quality CD-ROMS which could be sold to schools for the appropriate curriculum areas which could contain the following:

- A selection of images and film footage if available;
- Documentary and printed material;
- Statistical and technical information;
- Quality curriculum resources, lesson plans, excursion programs developed in conjunction with DET; and
- A possible 'virtual guided tour' of the Aerodrome, incorporating district views and locating it in its regional context.

The NSW school curriculum offers a range of opportunities for which the Aerodrome would be appropriate.

Signage

The current level of interpretative signage is inappropriate for the Aerodrome. The Aerodrome is a significant item which requires interpretative signage in order for visitors to gain an understanding of its historical importance. Interpretation signage is to be provided in accordance with the Heritage Council 'Heritage Interpretation Guidelines'. Interpretative signage should be included as a site specific exemption.

Directional signage to the Aerodrome is also lacking. The following signs should be considered:



- ▶ A general sign introducing the values of the Aerodrome should be placed in several places for example on Woodburn Road adjacent to the Aerodrome, and at the northern end of Memorial Airport Drive; and
- Specific signage should be erected adjacent to the important remaining features such as the Bellman Hangar, the machine gun pits, the runways and storm water drains.

Directional Signage

There is a need for better and more specific directional signage to the Aerodrome from within Evans Head.

The Richmond Valley Council should review all existing directional signage and implement a program of installing consistent and useful directional signage which includes information on car parking, visitor facilities and distances to the entrance of the Aerodrome where appropriate.

Visitor Guides

A comprehensive and practical walking guide for the Aerodrome should be developed which includes distances and particular points of interest of the walks. This should cater for the range of visitors the Aerodrome attracts, particularly the casual day-tripper wanting short and interesting walks. This guide should be locally available, in cafes, accommodation, shops and other locations where visitors are likely to go.

6.6.3 Other opportunities

There exist many opportunities on the Aerodrome to increase its use by the community and to generate some income for Council that would not detract from the heritage values of the place.

Other Aviation Uses / Opportunities

Some aviation related uses include:

- Fly In;
- Aviation Industry Field Days;
- Use by Historic Aircraft; and
- Ballooning.

Non Aviation Uses/ Opportunities

Some of these uses are not aviation related and include:

- Model air plane flying/competitions;
- Circus;
- Concerts;
- Sporting events; and
- Open-air cinema.

These activities would be compatible with the heritage values of the place as long as they do not result in any permanent structures being erected that would compromise current aviation use of the aerodrome. The activities suggested could all take place in the area immediately to the east of the existing Bellman Hangar.