Belconnen Naval Transmission Station: an inconvenient heritage

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Abstract

In 2005 the Department of Defence decommissioned the Belconnen Naval Transmission Station in Canberra. The place is entered on the Commonwealth Heritage list and on the Register of the National Estate. The transmission station is one Australia’s foremost technological achievements of the first half of the 20th century. For more than half a century it was a prominent feature on the landscape of the nation’s capital. As a key military installation marking the contribution of Australia to the victory in the Pacific during World War Two, it was surprising that the proposal to remove the majority of the physical features from the place did not contravene the recently enacted, now revised, Environment Protection and Biodiversity Conservation Act 1999 (C’wh). The only other extant historic low frequency transmission facility is the Varberg radio station at Grimeton in Sweden. Varberg was entered on the World Heritage list in 2004 prompting a reconsideration of the heritage values of the Belconnen facility. Actions by the Department of Defence to remove the three aerial masts/towers appears to have gone against the advice provided by the Department of Environment and Heritage in June of 2005. That advice was based upon recommendations by the Australian Heritage Council that at least one of the aerial masts and its supporting equipment was to remain in situ. In January of 2006, the Department of Environment and Heritage provided conditions under which the actions could take place but failed to stipulate how many masts should be removed or conserved. In November of 2006, Defence sent letters to local residents stating that the masts were to be lowered by use of explosive charges. At no time was a heritage management plan drafted for the place nor was an end-use established for the remains of the facility. On 27 November 2006, Egloff received correspondence from the Minister for Environment and Heritage stating that the action commenced on 21 June 2005 to have the BNTS entered on the National Heritage list had been extended to 23 December 2007, some 30 months later. This treatment of the BNTS under the EPBC Act casts severe doubts on the ability of Australia’s heritage regime to protect the significant fabric of listed places.

Introduction

“You cannot tell which way the train has gone by looking at the tracks”

The natural and cultural heritage values of the Belconnen Naval Transmission Station (BNTS)1 are well established and have been reinforced by further studies since its initial listing on the Register of the National Estate in 2002. That registration was confirmed and amplified by the entry of the place under five criteria on the Commonwealth Heritage list. The citation stresses that when constructed in 1939 to 1942, BNTS was one of the most powerful transmitters in the world. Dominant features of the heritage place are three ‘600 foot’ aerial masts/towers that soar over the transmission station and a multitude of high frequency aerials, some of which are unique.

Figure 1. View of Belconnen Naval Transmission Station from a hot air balloon showing the nearby suburbs of Canberra. (Photo by Owen Beasley, 2005)

to the place, a guardhouse and bunker from the World War Two era, a cricket pitch and the remains of the naval staff village. Heritage listed BNTS lies within the Belconnen valley of Canberra and comprises lands to be developed as the suburb of Lawson (Figures 1-2).

Figure 2. Belconnen Naval Transmission Station showing the three low frequency aerial masts, high frequency antennae and the transmission facilities. (Photo by Brian Egloff, 2006)
A study conducted by Catherine Webster (2005) suggests that BNTS compares favourably with and complements the Varberg low frequency transmission station at Grimeton, Sweden (Bergfors and Gustafsson 2001) that was entered on the World Heritage List in 2004. This could well be the case in that the 1920s facility at Grimeton when coupled with the 1930/40s Belconnen Naval Transmission Station provides a continuum of low and high frequency radio communication technologies from World War One, and the early years of World War Two into the first decade of the 21st century. It appears as if the Belconnen facility and the Grimeton facility are the only two relatively intact low frequency stations remaining from the period spanning 1920 to 1940. Grimeton speaks to Nordic nationalists as the communication technology was developed by chief engineer Ernst Fredrik Werner Alexander (1878–1975). On the other hand, BNTS is one of Australia’s foremost engineering achievements of the first half of the 20th century; made almost entirely of materials available in Australia employing local technological expertise (Muscio 1984). BNTS was of major military importance, certainly marking one of Australia’s foremost contributions to victory in the Pacific during World War Two.

A feasibility study commissioned by National Radio and Communications Museum Ltd (AT Consulting and NRCMA 2004) suggests that there is a reasonable alternative to the salvage process outlined in the advice from the Department of Environment and Heritage (DEH) to the Department of Defence (Defence).

The natural values of the place consist of Danthonia grassland that represents the largest area in good condition in the ACT, with a population of Ginninderra Peppergrass (Lepidium ginnindereense) and provides the habitat for the endangered species the Golden Sun Moth (Synemon plana). These species have been accorded considerable attention and Defence has been required to protect. Those values during the decommissioning process. The fauna habitats that are being protected are, for the most part, found within the fenced grounds of the transmission facility and may negate development of most, but not necessarily all, of the area under the transmission towers.

The landscape values of the place are considerable, including one of the last fenced and intact sections of a travelling stock route in the ACT, as well as extensive native grasslands and various tree alignments. Scatters of prehistoric stone materials have been recorded in close proximity to the transmission towers.

In reply to a request by Egloff for emergency listing as National Heritage, the Minister sought and received advice from the Department of Environment and Heritage (6 July 2005). The Minister stated that the values of BNTS reflect its historical association, rather than rest implicitly with the extant fabric. The impact of such a precedent is almost beyond comprehension. It means that places listed on the Register of the National Estate and the Commonwealth Heritage list, and by extension the National Heritage list or indeed Australian entries on the World Heritage list could, when convenient to do so, be considered as having associative values alone. The BNTS precedent implies that the conservation of the physical fabric would then be of little importance even though the entry of the place on heritage lists may have been based upon the integrity of its physical fabric.

The issues mentioned above will be dealt with following a brief description of the Belconnen Naval Transmission Station (also referred to as Royal Australian Naval Transmission Station) and

Register of the National Estate and Commonwealth Heritage Listing

BNTS is entered on to the Register of the National Estate and that listing carried forward on to the Commonwealth Heritage list. For the purposes of this study the Statement of Significance offers a succinct description of the place:

The Royal Australian Naval Transmitting Station at Belconnen, comprising the three main aerial masts, elements of the Rhombic and Omni Vector aerial arrays, transmitting hall, guard post and guard house, the cricket pitch and the village site, including the tree plantings, shelter belt radiata plantations, subdivision and tennis courts and road system, is important for its association with the development of Australian Naval Communications in Australia from 1938 in the lead up to the Second World War 1939–45. Completed in 1939 the Transmitting Station was the most powerful naval wireless station in the British Empire and the largest naval or commercial station in the southern hemisphere. The extant fabric of the transmitting station and the relict village site are important in illustrating the significant role the base played in naval communication both during and after World War Two. The area developed for the village is important in demonstrating the functioning of the station in its relatively remote setting. (Criterion A.4)

The Transmitting Station is important as a rare example of the technical development of Australian Naval Communication during the inter-War years. This is illustrated by the design and technical achievement expressed in the three 600 foot aerial masts, assembled on site and aligned east-west to maximise transmissions to the Pacific and Indian Oceans and the intact 44,000Hz, purpose built, low frequency transmitter complex, which, in conjunction with Rugby in England, made it possible to communicate with British Merchant or Fleet shipping anywhere in the world (Criterion B.2 and Criterion F.1).

The Transmitter Building, 600ft aerial masts, Guard House and guard post and the access road and associated village site, including the subdivision and landscape elements, are important in demonstrating the design, layout and functioning of high powered, low frequency, transmitting stations developed by the Commonwealth for long distance radio communication prior to and during World War Two (Criterion D.2). The place is highly valued for its social and symbolic associations by members of the local community including former Navy personnel in particular the WRAN, for whom the establishment of the transmitting and receiving stations in Canberra resulted in the training of women as telegraphists under Mrs Florence McKenzie, founder of the WRAN service, and in the development of Canberra. (Criterion G.1)

BNTS has been maintained in working order as it provided the Royal Australian Navy with low and high frequency radio transmission facilities up until decommissioning in mid 2005. At that time the 250k low frequency transmitters were intact however the aerial conductors had been removed from the three 600 foot aerial masts/towers (Figures 3–7).

By comparison, dating from the 1920s, the Varberg facility at Grimeton is said to epitomize the post World War One need to open peaceful world-wide communications while the BNTS was designed to augment communications in anticipation of a second international war. BNTS has considerable to sense the
tragic sinking of *HMAS Sydney* with the loss of all naval personnel aboard. The loss of the vessel became apparent when radio transmissions ceased. BNTS was also of considerable value during both the battles of Midway and the Coral Sea as well as relaying the outcome of the Battle of the River Plate. As the main radio transmission station for all Australian Navy vessels at sea, for more than sixty years, it provided an invaluable link throughout the world. To lose touch with BNTS meant that one was really 'at sea' so to speak. To be in active communication with BNTS provided a tremendous sense of being in touch with the home country.

**Decommissioning and heritage issues**

In June of 2005, it was drawn to the attention of Egloff that BNTS was being decommissioned and that there was a possibility that equipment and facilities would be removed from the place. In an attempt to forestall any damage to the heritage values of the place, Egloff requested on 21 June 2005 that BNTS be nominated for emergency entry on the National Heritage list. That action was unsuccessful but did bring the matter to the attention of the wider public as the statement of
reasons for not entering the place on the National Heritage list was published on the DEH website. It is necessary to review the Minister’s reasons for not entering the place on the National Heritage list and note that this is not only a prominent built feature on the landscape of the Australian Capital Territory but also a place that has not been adequately assessed for national or international heritage values. The Minister of DEH clearly stated that the place may meet at least one of the criteria for entry on the National Heritage list as follows:

The historical importance of the transmitting station has been clearly identified, in particular its strategic role in providing worldwide coverage and the ability to penetrate seawater to reach submarines, as well as the role of communication during World War II when radio intelligence was a focus of allied efforts. From 1940 onwards, the Belconnen and HMAS Harman (constructed from 1939, and commissioned in 1943) facilities maintained direct contact with Singapore, Cavite and Batavia. Continuous wireless contact was maintained between London, Colombo, Pearl Harbour, Guam and Wellington, as well as Darwin and Perth (University of Canberra 2001: 24).

The Belconnen facility was also involved in US military activities in the Pacific, in monitoring Japanese communications. Major code breaking efforts were conducted in three places: the Philippines, Pearl Harbour, and Washington, DC. The Philippines station was moved to Australia, and called Station Belconnen (Gardella, 1992). US military radio traffic passing through Belconnen in May 1942 assisted in the identification of Midway as the focus of Japanese military objectives (www.ibiblio.org/hyperwar/PTO/Magic/COMINT-CoralSea/PartTwo.html#fn64).

The Royal Australian Naval Transmitting Station is related to a major theme of the development of communications and defence in Australia – the strategic importance of the UK and the US in the nature and focus of the implementation of Australia’s policies in these areas, as seen in this facility, the earlier Overland Telegraph Line, and the later Harold Holt transmitting station.

I considered the above evidence showing that the Royal Australian Naval Transmitting Station had a military communications function, linking Australia to two major political and military powers, the UK and the US, during two theatres of war. This evidence demonstrates the role of the place, as a significant component of Australia’s naval communication story, and a part of the story of the defence of Australia, through Australia’s strong historical and geopolitical ties with the UK and the US. I believe that the Royal Australian Naval Transmitting Station may have outstanding heritage value under criterion (a) [author’s emphasis].

The Minister, Ian Campbell, then went on to state:

I then considered whether the potential historic National Heritage values identified above were under threat. The application for emergency National Heritage listing was made on the basis of the threat posed by the decommissioning of the Royal Australian Naval Transmitting Station. The specific actions referred to by the nominator included the removal of the transmission towers, aerials, interior fittings and historical heritage objects from the place, the dismantling of the heritage transmission towers, and the removal of heritage objects from the facilities. An additional threat identified by the nominator was vandalism of the site, should security not be maintained.

Previous advice provided to my Department by Defence on its decommissioning proposal included reference to the following actions: the removal as scrap of all but part of one of the VLF towers, the part to be retained for possible future interpretation on site; removal of some equipment for reuse at other Defence sites; and the removal as scrap of all but one good condition example of each other type of antennae. All retained antennae are to be dismantled and stored on site for future reference.

Advice from the Australian Heritage Council (AHC), Minutes of 17 June 2005: ‘recommend to Defence that the whole of one tower be retained along with the equipment which would support the functioning of that tower’ and the correspondence of 21 June 2005 from David Young of the DEH to Defence:

‘recommend to Defence that the whole of one tower be retained along with the equipment which would support the functioning of that tower’. In respect of the three 600 ft VLF towers – all of one tower should be retained in situ, along with the equipment which supported the functioning of that tower.

Ian Campbell goes on to state that:

My Department advised me that Defence intend to take mitigating actions to reduce the impact of the decommissioning proposal on the heritage values of the place. These include recording the three 600ft VLF towers in accordance with NSW Heritage Office photographic guidelines before removal, providing interpretive signage on site, retaining the copper wire base and footings of the three 600ft VLF towers, and retaining all buildings on site.

Defence indicated to my Department that decommissioning of the site would commence as soon as the contract for the proposal has been let, and should be complete by the end of the year.

No information has been provided on whether security of the site will be maintained during the decommissioning process. Therefore, it has not been possible to assess the nominator’s claim of the additional threat posed by vandalism. However, if the site is unattended the risk of vandalism may increase.

I noted that the potential historic values identified under criterion (a) rest with the place’s association with the story of the defence of Australia. NHL criterion (a) is the criterion of events and processes, one that acknowledges historical associations of outstanding heritage value to the nation. It is a criterion related not so much to values inherent in the physical evidence of a place, but to its intangible qualities. The elements of the Royal Australian Naval Transmitting Station that reflect outstanding heritage value to the nation under criterion (a) are: the three 600ft aerial masts and earth-mat, elements of the aerial farm including the Rhombic and Omni Vector aerial arrays, the transmitter hall and 44kHz transmitter, the guard-posts and guardhouse, the planning and layout, and the village site.

Given that the values of the place under criterion (a) reflect its historical association, rather than rest implicitly with the extant fabric, the decommissioning strategy proposed by Defence preserves the values of the place [author’s emphasis].
The Minister should have been aware that his consideration of the National Heritage values of BNSTS actually included two distinct and different decommissioning outcomes. One, preferred by Defence, but not endorsed by DEH, was the removal of the three aerial masts/towers and the other stated by his department upon the advice of the Australian Heritage Council recommended the retention of one transmission mast/tower and associated equipment. The only other communication with Defence, 'Decision to approve the taking of an action' of 19 January 2006, does not explicitly state that all three masts should be removed.

As mentioned above, the strategy proposed by Defence, the removal of all masts and aerials, directly contradicted the advice of DEH and the recommendation of the Australian Heritage Council. When notified that the request for an emergency entry on the National Heritage List was unsuccessful, Egloff nominated the place for entry to the National Heritage list through the 'routine' process. As of November 2006, some 15 months after the initial proposal for listing, a decision on the entry of BNSTS on the National Heritage list has not been made even though the Minister acknowledged that the place may have National Heritage values.

The Department of Environment and Heritage (DEH), the Australian government agency responsible for heritage matters and the implementation of the EPBC Act, stipulated that Defence must provide an annual report of its decommissioning activities by the first of July of each year. A copy of that report was requested by Egloff under the provisions of Freedom of Information Act 1985 (Cwlth) (FOI). However the report was not provided. The Department of Defence either has not forwarded the report DEH, has not drafted a report, or DEH has chosen not to release the annual report. However, Defence has allowed visits to the site during the dismantling of the facility.

Actions by government of Australian Capital Territory

In the Australian Capital Territory (ACT), heritage listing is the responsibility of the federal government when places lie on Commonwealth lands and when they are situated on Territory lands the places are the responsibility of the ACT government. As BNSTS lies on Commonwealth lands and is listed as such, the maintenance of heritage values is the responsibility of the Department of Environment and Heritage and the Department of Defence. It was assumed that once the station was decommissioned there would be an orderly and planned hand-over of the place from the Commonwealth to the Territory and that the ACT Heritage Council would play an integral part in the process. However this was not to be the case. One and a half years after the decommissioning, it is understood that there have been no meaningful discussions between DEH or Defence and the ACT Heritage Council. Apparently the AHC did not consider the views of the ACT Heritage Council when providing advice to Defence as there is no mention of it in the minutes of the AHC meeting that were provided to Egloff under FOI. One would have thought that as, or if, it was the intention of Defence to transfer the lands to the Territory government for the establishment of the suburb of Lawson, that the views of the ACT Heritage Council would have been sought and taken into consideration.

However, DEH did ask the ACT Heritage Council for its views on the request by Egloff to the federal Minister for emergency National Heritage listing. On 28 June 2005, the Secretary of the Council wrote:

Council is of the understanding that there are statutory requirements for preparation of Management Plans by Commonwealth agencies for any of their places that are on the Commonwealth Heritage List, and anticipates that preparation of such a plan would be a prerequisite to any disposal or change of management regime.

In summary, the ACT Heritage Council considers that the existing provisions under the Environment Protection and Biodiversity Conservation Act 2001, with regard to the disposal of places of Commonwealth Heritage significance, are adequate to insure the protection of the heritage place after disposal. We would also anticipate the preparation of a Conservation Management Plan for the place would be a component of the disposal process and the Heritage Council would expect to be given the opportunity to comment on this plan prior to finalisation. If it were to become Territory Land the Heritage Act 2004 would protect significant heritage values.

The obvious questions to ask are; firstly, if the ACT Heritage Council was under the understanding that a 'Conservation Management plan' was a requirement of disposal why was the Australian Heritage Council not under the same understanding. The second question to ask is; Why did the AHC make a decision on the place without any reference to the ACT Heritage Council or to any briefing papers prepared by the DEH. Apparently only the proposal of Defence was considered and there is no mention in the Minute of the AHC of a fact-finding visit to the site by any of the members of the Australian Heritage Council or their officers. Obviously there are considerable gaps in reciprocal relations between the territory and the federal agencies that administer heritage acts and there is some misunderstanding of the requirements of the EPBC Act as it pertains to Commonwealth listed places.

Section 341S, of the EPBC Act, 'Management plans for Commonwealth Heritage places', states that:

(1) A commonwealth agency must make a written plan to protect and manage the Commonwealth Heritage values of a Commonwealth Heritage place it owns or controls.

The requirement for a management plan seems to be rather straightforward and unambiguous. It occupies several pages of the EPBC Act and can hardly be overlooked. Is it a fair question to ask; Why has Defence not met with the provisions of the act, yet has received endorsement in part for its actions by the AHC and is allowed to demolish and remove major components, particularly those explicitly listed in the statement of significance for the place? However, with reference to the Department of Defence website, management plans for their heritage listed places will not be completed until 2010 or 2015.

Decision to approve the taking of an action

On 19 January 2006, further advice provided by DEH to the Department of Defence stated various conditions contingent on the approval to take an action. One of the requirements is that prior to commencement of the action there must be a 'Stakeholder Risk Assessment Workshop'. If such a workshop was held, to the best of the author's knowledge it did not include stakeholders that had registered their interest through correspondence with the Minister such as; National Trust of
Australia (ACT), ICAHM (International Committee for Archaeological Heritage Management), Australia ICOMOS, Sweden ICOMOS, TICCIH (International Committee for the Conservation of the Industrial Heritage), Dr. Michael Pearson (Chair of the ACT Heritage Council), Dr Peter Dowling representing both the National Trust of Australia (ACT) and Naval communication veterans groups, and the Australian Institute of Engineers.

Clause 4 of the Advice from DEH to Defence reads, 'The person taking the action must... secure and maintain historic buildings, equipment and other listed Commonwealth heritage values; periodically inspect the HF aerials for signs of deterioration... ensure that the LF masts and HF aerials are interpreted... consider opportunities for storing and re-erecting retained examples of antenna, consider adaptive reuse of the buildings... implement interpretation within 24 months of disposal of the site. Here it is assumed that the site will be disposed of, but Defence has stated that it has no end-use plans for the place.

According to DEH requirements, Defence will be responsible for the interpretation of BNSTS even after it has disposed of the site and by 1 July of each year a report will be filed with the Minister. The report was requested by Egloff under Freedom of Information (FOI) but was not provided. This is a key document as presumably it will state just what equipment was removed, to where and what equipment is left.

A pertinent provision of the EPBC Act states that the Commonwealth may 'provide support' for the conservation of Commonwealth Heritage listed places. If one were cynical, this would imply that for cost-cutting measures it is advisable to remove heritage listed places rather than to maintain them.

Freedom of information

Egloff sought to determine what advice DEH had provided to Defence as well as the current status of the place following salvage actions by Defence. Four documents were considered by DEH as meeting the FOI request for copies of the advice provided to Defence by the AHC as well as the report on public comments to be provided by Defence to DEH.

Document 1 Royal Australian Naval Transmitting Station – Consultation sought in relation to s.3412D of the Environment and Protection Biodiversity Conservation Act 1999 (EPBC ACT) Report submitted to Australian Heritage Council for consideration of s.3412D request (17 June 2005). This document is the request by Defence to DEH and the AHC to undertake its preferred decommissioning option.

Document 2 Commonwealth Heritage Places – Advice on Changes EPBCS3412D (3). Extract from AHC 20 Minutes-Decision on s.3412D request (17 June 2006). This is the consideration of the above by the AHC.

Document 3 Letter to Mr Geoffrey Beck, Head Infrastructure, Infrastructure Division, Department of Defence, from Mr David Young, First Assistant Secretary, Heritage Division, Department of Environment and Heritage, Advice under s3412D of the EPBC Act (21 June 2005). This correspondence relays the recommendation of the AHC to Defence.

Document 4 Letter to Ms Anne-Marie Delahun, Assistant Secretary, Environment Assessment Branch, Department of the Environment and Heritage, from Mr. Rick Zentelis, Director, Defence Heritage Management, Department of Defence, Response from Defence on the public notification period for EPBC Referral 2005/2218, (18 November 2005) includes list of all equipment (not provided under FOI) and attached is the public comment letter of Egloff dated 14 November 2005. Defence called for public comments on the proposal and then refused to release the report on the public comments. That report was sought under FOI but was not available to DEH (almost one year after the report was prepared), but a copy of the submission by Egloff was provided with comments by Defence indicating that a number of matters were more correctly addressed by DEH. Just why Defence called for public comments on a heritage matter and then stated that either the comments were inappropriate or were the purview of DEH makes nonsense of the process particularly given the confidential nature of public comments.

The letter to Delahun from Defence seeks a speedy approval noting that it is currently costing approximately $3,500 per week insuring that the infrastructure on site is secure and does not present a public risk. BNSTS has been placed on the Defence disposal list pending future sale. Defence appears to have no plans for the remains of the BNSTS. Presumably Defence will be required in perpetuity to secure the place and to make it safe. It is more than obvious that Defence should have sought an end use for the intact BNSTS such that the Department of Defence will not have to bear the ongoing cost of both securing the place and interpreting it to the public.

Role of the Australian Heritage Council

The Minutes of the Australian Heritage Council (AHC) meeting of 17 June 2005 were obtained under Freedom of Information. The deliberations on the matter of the impact of the decommissioning of the BNSTS are recorded in one brief paragraph with no member of the Australian Heritage Council recorded as objecting to the actions. That paragraph is as follows:

Council praised the quality of the paper on options for decommissioning the Royal Australian Naval Transmitting Station at Belconnen. Council agreed that it was not practical to retain all of the equipment at the site, either in use or not in use. It was agreed to recommend to Defence that the whole of one tower be retained along with the equipment which would support the functioning of the tower. In regard to the transmitter building and other aerial arrays it was agreed that the option proposed by the Department of Defence should be supported. Council indicated that it needs to be understood that the dismantled equipment should be stored in such a way that in future it can be easily displayed and interpreted.

That Defence was able to proceeded with the dismantling of a heritage listed place with a yet to be determined end-use and no conservation management plan did not seem to be of concern to the Australian Heritage Council nor did it seek to clarify the status of the BNSTS with respect to National Heritage or World Heritage listing.

The reply by the AHC is perplexing to say the least, particularly the statement that 'the whole of one tower be retained along with the equipment which would support the functioning of that tower'. One has to ask the question as to just how could a single tower function on its own? What is of grave concern is the statement that the 'option proposed by the Department of Defence should be supported.' None of the proposed options
consider the retention of 'the whole of one tower'. The Defence preferred option (3) is as follows; retain some equipment, with some removed for reuse elsewhere on Defence sites, retain part of one tower, not in use, and remove the rest as scrap, retain an example of each antenna, dismantled and stored on site, and remove the rest as scrap.

If the consideration of the likely impact on the heritage values of the decommissioning of the BNSTS by the AHC is an indication of their business processes, then there is real concern for the implementation of the EPBC Act as well as the effectiveness of the AHC or its ability to coherently discuss and record heritage issues that are brought before it. None of the decommissioning actions or options listed by Defence state exactly what equipment and materials will remain and how the place could function following decommissioning. A list of all equipment was provided to the Department of Environment and Heritage but it has not been made available to the public and was not included in the documents obtained under Freedom of Information. The teleconference document states that ‘Defence commissioned a Statement of Heritage Impact for the Decommissioning Proposal’ and that the report ‘discusses management options, and makes recommendations aimed at mitigating the impacts of the decommissioning process on the heritage values of the place’.

The ‘Statement of Heritage Impact’ was not provided under Freedom of Information nor is it referred to in the minutes of the AHC meeting. No future management regimes for BNSTS are discussed in any of the documents other than ‘disposal’ and that CSIG (Corporate Services and Infrastructure Group of Defence) will manage the site in ‘stasis’ until plans for the site’s future use are more developed. Defence does state that the facility will be non-operational and that the removal of the three 600 ft VLF towers, and other equipment is unlikely to impact on the historic heritage values, or natural values but could impact on the indigenous heritage of the place.

The EPBC Act (341ZA Heritage Strategies) also requires that ‘If a Commonwealth agency owns or controls one or more places, the agency must: (a) prepare a written heritage strategy for managing places to protect and conserve their Commonwealth Heritage Values’. As of November 2006 the Defence heritage places strategy comprised the following:

- Defence Heritage Strategy
  
The Strategy is a key requirement under the new Commonwealth heritage regime. It will set the priorities and targets for Defence heritage management. The draft Strategy is currently being refined in conjunction with the Department of Environment and Heritage and will be released soon. A key undertaking of the Strategy is to have management Plans for all Defence heritage places by 2015.

There is considerable doubt if the preparation of management plans for Defence heritage places is at all a useful exercise, if it does not afford some degree of protection for the physical fabric. As is so clearly demonstrated by the BNSTS decommissioning precedence, that the physical fabric of a heritage listed place can be disposed of without endangering the heritage values of a place.

Protection afforded by Commonwealth and National Heritage

It is fairly obvious that the entry of BNSTS on the Commonwealth Heritage list provided no protection from Commonwealth actions. And, that the attention paid by the AHC to the impact of decommissioning was not adequate to protect the values. What is patently obvious is even if BNSTS was on the National Heritage list that the in situ fabric of the place would not have been protected as the Minister asserted that its values were based in association and not in fabric.

Association as a value

The term association as a concept and its practical application are not widely discussed in Australian or international heritage literature. Most discussions focus upon the four key significances or values; social, aesthetic, scientific and historical. Integrity and authenticity are also widely discussed. Association is included in Criterion A of the Register of the National Estate which states:

- Its importance in the course, or pattern, of Australia's natural or cultural history.

Subclause A.4 states:

Importance for association with events, developments or cultural phases which have had a significant role in the human occupation and evolution of the nation, State, region or community.

The National Heritage List criteria and the Commonwealth Heritage List criteria employ the term association in a similar fashion:

- The place has outstanding heritage value to the nation because of the place's strong or special association with a particular community or cultural group for social, cultural or spiritual reasons (Criteria g)
  
... because of the place's special association with the life or works of a person, or group of persons, of importance in Australia's natural or cultural history (Criteria h)

The term associative is used with respect to the three categories of World Heritage cultural landscapes: landscape designed and created intentionally by man; organically evolved landscape; and, associative landscape. The inscription of an associative cultural landscape 'is justifiable by virtue of the powerful religious, artistic or cultural associations of the natural element rather than material cultural evidences, which may be insignificant or absent'.

To a greater or lesser extent all places of heritage value are likely to have an association with something that is intangible as well as have a tangible presence. However, there is no reason to believe that the physical fabric of a place is of no, or diminished, heritage value simply by virtue of its demonstrating an association with an event. As can be seen with the World Heritage cultural landscape definition, associational is employed when there is little if any cultural material on the place. An associational value is not used to diminish the value of physical features be they natural or cultural. As stressed by heritage experts, the Minister's use of association as implying that the physical features of BNSTS are of lesser importance is misled.

World Heritage Convention obligations

Australia is a party to the World Heritage Convention 1975 and was the first state party to enact legislation to give effect to its convention obligations (Peek and Reye 2006:206). Initially this was done through the World Heritage Properties Conservation Act 1983 that was replaced by the EPBC Act. Australia has the
power to legislate for external matters and to give effect to international agreements, and as such it is bound to protect and identify world heritage. Perhaps it is ironic that the legal precedents with respect to world heritage have been established in three Australian court actions. Patrick O’Keefe quotes from Queensland v Commonwealth ‘a point made succinctly by the seventh judge, Dawson J’ as follows:

What emerges from the terms of the Convention with clarity is that it is for a State Party to identify for itself the cultural and natural heritage on its territory. It is not a matter for the World Heritage Committee. The obligation of a State party to protect, conserve, present and transmit to future generations the cultural and natural heritage situated on its territory does not flow from any listing upon the World Heritage List. It flows from the identification by the State Party of its cultural or natural heritage, an identification which the State party is under duty to make.

O’Keefe (1994:263) states that ‘the obligations of the Convention apply even before formal public identification’. However, the bottom line is that each state party has discretion in determining the measures by which it will implement the obligations of the Convention’ (Peek and Reye 2006:9). It is apparent that the government of Australia in keeping with the spirit of the convention, when it was brought to its attention that the Varberg radio station had been entered on the World Heritage list and that there were compelling similarities with the Belconnen facility, should have conducted an inquiry into whether or not BNTS had world heritage qualities. In the statement of reasons for not entering BNTS on the National Heritage list, the Minister stated that ‘the values of the two places’ are different. Of course they are different but that should not lead to such a casual dismissal of the concept that BNTS has World Heritage qualities, even though they may be different from those of the Varberg radio station.

International conventions are not necessarily binding and there is a great deal of latitude in how they are applied by sovereign nations, but if a state party wishes to be a respected member of the group and not have its heritage conservation processes placed under close scrutiny or held in disdain it should adhere to the spirit of the convention and not apply the provisions in an uneven fashion only when it is convenient to do so.

Irony
Initially it was thought that the reluctance of the Department of Defence to conserve the heritage qualities of BNTS rested in the commercial value of the land for urban development. However, it was reported by The Canberra Times that ‘A spokes women for ACT Planing Minister Simon Corbell said that Government was not proposing to buy the land, as most of it could not be developed for environmental reasons.’

Media and public attention
Individuals and organizations sent letters to the editor of The Canberra Times but the press was all but silent on the issue except for two brief articles. Given that the BNTS occupies a dominant position in one of Canberra’s valleys, it is surprising and somewhat disconcerting that the press was either unwilling to air in public the plans by Defence to salvage one of Canberra’s most dominant landscape features or thought that the issue was not news worthy. In order to stimulate the press, on 20 July 2006 eighty or more professionals with all manner of interests in the heritage of BNTS attended a symposium at Engineering House in Canberra to discuss the heritage significance and uncertain future of the Belconnen Naval Transmitter Station. Interested non-government organisations represented included: Engineers Australia; Engineering Heritage Australia, and Engineering Heritage Canberra, The National Trust of Australia (ACT); The International Committee for Archaeological Heritage Management of ICOMOS, Australia ICOMOS as well as representatives from various Naval associations. The media, television and the press were invited and made a commitment to attend, but on the day were noticeable by their absence. At that meeting a concise three-page document was drafted that succinctly summarised the military and engineering heritage value of BNTS. At that seminar Harold Adams, Commodore RAN (Ret’d) stated that:

Many here today will have seen outside the Australian War Memorial the Amiens gun captured in WWI and marvelled at its size as an instrument of war. While it is a remarkable war trophy, can I suggest that it has as much to do with the history of Australia’s security as my great aunt’s knitting needles on which she knitted hundreds of socks and jumpers during the war.

On the other hand the ‘Bella’ Naval Transmitting Station made a vital contribution to the successful outcome of naval operations around the Australian coast and into the Pacific and Indian and Southern Oceans. It didn’t fire shells or missiles, it didn’t shoot down any enemy aircraft, and there is no smell of cordite. Instead it fired off invisible radio waves 24 hours a day, 365 days of the year and its impact was vital to the successful defence of this country and the defeat of the Axis powers at sea.

Following on from the symposium, a letter from Harold Adams, titled ‘Unique piece of engineering’, published in The Australian, spoke out strongly against the ‘failure of the federal government to preserve the Belconnen Naval Communications Transmitter Station’. Adams also wrote about ‘its vital role in the great strategic naval engagements’ of the Second World War as well as how important is was to successful convoy operations.

Summary of an ‘inconvenient heritage’
The decommissioning in 2005 of the Belconnen Naval Transmission Station (BNTS) by the Department of Defence, raises critical issues pertaining to the level of protection afforded to Commonwealth Heritage listed places as well as places considered to have National Heritage values and to places where there is good cause to assert that they may have world heritage values. It has been assumed that the Environmental Protection and Biodiversity Conservation Act 1999 (C’wth) would afford a degree of protection or at least act as a trigger mechanism to bring about a rigorous process of conservation management planning, particularly for properties owned and operated by the government of Australia. This most certainly is not the case with respect to BNTS and throws open the question as to just how effective is the recently initiated national heritage regime that is coming under increasing criticism, particularly in the light of 2007 amendments that further weaken the act. Secondly, and perhaps just as important, it is likely that the BNTS had world heritage qualities prior to the removal of the masts and antennae during the decommissioning process. The only other station of its kind in the world is inscribed on the World Heritage list, and as such
the government of Australia has some obligation under the UNESCO Convention Concerning the Protection of the World and Natural Heritage 1972 and its enabling EPBC Act to safeguard those values even though the place is not entered onto the World Heritage list (Peek and Rye 2006; O'Keele 1994).

It is necessary to consider the broader implications of an assertion that a place fulfills no less than five criteria on the Commonwealth Heritage list only has values that lie primarily in its associations and that the physical fabric has little heritage value. It appears as if following decommissioning the Belconnen Naval Transmitting Station, listed on both the Register of the National Estate and on the Commonwealth Heritage list, with acknowledged National Heritage values and possibly World Heritage values will comprise no more than a portion of one dismantled tower, the tower bases, and no more than six dismantled antenna and all buildings and some unspecifed equipment. There is no doubt that under the current interpretation of the Environmental Protection and Biodiversity Conservation Act 1999 (C'with) by the Department of Environment and Heritage, that only a portion of a place needs to be retained to maintain heritage values and that the part which is preserved need not be functional or comprise the dominant characteristic of the place, gives rise to considerable concerns. What is patently obvious is that even if BNTS was on the National Heritage list that it would not have protected the fabric of the place as the Minister asserted that its values were solely intangible.

The 20th Century scientific heritage of Australia, when compared to its architectural heritage, receives little attention and at best seems to pose problems for preservationists. One need look no further than the ACT, which in 2003 it lost to bush fires a premier heritage feature and tourist attraction, the heritage listed Greater Melbourne Telescope at Mt Stromlo. That facility, like the Belconnen Naval Transmission Station, was capable of being put to a useful research and community science purpose. It had been maintained and operated at little cost to the Australian taxpayer or ACT ratepayer by enthusiastic amateur astronomers. The Commonwealth government and the ACT government can be held responsible for destroying two out of the three space tracking stations that were instrumental in the NASA lunar landings. In a situation very similar to that of the BNTS, only the footings of the buildings were retained under the policy that the conservation of a fragment of a place is enough to preserve its heritage values. Oh, there also needs to be a sign to tell the public what was once there and how important is was to the 'course, or pattern, of Australia's natural or cultural history'.

It is very worrisome when peak local, national and international heritage organizations and agencies, as well as the public, urge caution, that there is no shift whatsoever in the processes required under the EPBC Act. For instance, in the correspondence from Australia ICOMOS of 14 July 2005, to Senator the Honourable Ian Campbell, Kristal Buckley the President wrote:

... great concerns about the advice provided by the Department of Environment and Heritage that the Defence proposals were not likely to have a significant impact on the environment.

In summary, this whole matter raises substantial concerns about the implementation of the national heritage system, and at best seems to have suffered from a series of major errors.

As a matter of urgency, Australia ICOMOS requests that you take all steps to reverse this series of decisions or, at the least, suspend them until a further and independent expert review is undertaken.

Also of concern, is the lack of attention by the media. Obviously something is not working with respect to the preservation of the built heritage in Australia. Either the national and state/territory heritage regimes are easily corrupted and/or our local and national heritage organizations are ineffectual when and where it counts. Certainly it makes a mockery of heritage processes that should facilitate stakeholder participation. It is of some concern that given the considerable body of correspondence from individuals, professional and heritage organizations to Ministers of the federal government and to government offices coupled with the public meeting and the press exposure, although limited, no concerns or interest was raised at the administrative or political level, and at no time was there any recognition that there was any level of public or professional interest in that place such that would warrant any change in the decommissioning/salvage process. The question that needs to be asked and answers provided for, is how then are we as heritage specialists expected to react to situations like the decommissioning of BNTS? Do we need to establish a permanent community organization, that is not aligned or supported by the government, that will act as a heritage advocate such as has proven to be successful with respect to natural values in Australia and cultural values in the United Kingdom?

Generally speaking when an adverse impact is planned to take place through Commonwealth actions, the matter is dealt with under section 341ZC of the EPBC Act which states that a 'Commonwealth agency must not take an action that has, will have or is likely to have adverse impact on... Commonwealth Heritage values of a Commonwealth Heritage place, unless:

(a) there is no feasible and prudent alternative to taking the action; and

(b) all measures that can reasonably be taken to mitigate the impact of the action on those values are taken.'

In the BNTS instance it was not necessary to refer to these requirements of the Act, as the removal of the physical fabric was found to not constitute a threat to the Commonwealth values of the place. This is rather frightening and makes a mockery of the preparation by Defence of conservation management plans if when it is convenient to do so, the fabric is judged not to contribute to the heritage values of the place. There is no doubt that when the Natural, Cultural and Military Assessment - Belconnen Naval Transmitter Station and ACT Government Land, Lawson (Egloff, et al.) was drafted and the listings for BNTS were prepared for the Register of the National Estate and for the Commonwealth Heritage list that the fabric of the place was judged to reflect the primary component of the heritage values.

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References
Gardella, LCDR P.R. A Certain Grandeur: US Communications Intelligence in the Pacific War, 1941-1945, GSC. (from the DEH Statement of Reasons…)
Webster, Catherine (2005) Belconnen Naval Transmission Station (Low Frequency Transmitter), Canberra: University of Canberra post graduate diploma heritage management project.

Newspaper articles
The Australian, 28 July 2006, page 15 ‘Unique piece of engineering’, letter by Harold Adams, Commodore (RAN) (Ret’d)

Web sites
The following web sites provided additional material (as of 26 November 2006) on the Belconnen Transmission (Transmitting) Station:
www.act.nationaltrust.org.au/BelconnenNavalTransmittingStation.htm
http://www.rncba.org.au/Communique_BNTS.htm
http://www.act.nationaltrust.org.au/BelconnenNavalTransmittingStation.htm

Endnotes
1 At times the place is referred to as ‘Belconnen Naval Transmitting Centre’.
2 It is not certain at the time of the writing of this report in November 2005 (redrafted a year later) just how much of the facility has survived the decommissioning process or if further decommissioning actions are to be anticipated.
4 Correspondence to the Minister from Australia ICOMOS, ICHAWS, Dr. Michael Parkinson, and the National Trust of Australia raised concerns that the advice from the DEH to Defence set a dangerous precedent.
5 Refer to Australian Heritage Date Base on www.ahd.gov.
7 Section 34(2G) Commonwealth assistance for protecting Commonwealth Heritage Places.
8 10 May 2006, Egloff sought documents from DEH relating to how the decision to demolish the place was made. On 10 July, he was informed that the cost of $75.60, in addition to the filing charge, was being levied. This included three hours of ‘decision-making time’. On 31 October the documents were provided (some five months after the initial request).
10 Four members of the AHG are listed as present at the meeting, The Clearing Officer, David Young, is not listed as being in attendance and the name of the Action Officer has been blanked out.
11 Just what constitutes part of one tower and how it is to be retained was not specified.
12 Here reference most likely is to Indigenous sites evidenced as stone artefacts that are in close proximity to the base of one of the towers.
13 From Department of Defence web site
14 One recalls the distressful incident at the most hallowed of Australia’s sacred places, when allegedly builders desired an ‘executive’ parking lot at the ANZAC battlefield at Gallipoli, without any conservation planning taking place and with scant regard for the physical fabric of the place in the form of human remains (Dore 2006).
16 The Australian Council of National Trusts in a Media Release of 02/11/2006, Our concerns are many... This bill is 409 pages long and will amend an Act the EPBC Act which is over 600 pages in length. The system that it sets up is complex, convoluted and confusing. It builds on the failures of the current Act, expanding the discretionary powers of the Minister at the expense of transparency and achieving any real conservation gains.’
17 The Varberg facility at Grimeton, Sweden