



Point Nepean National Park JOCHEN BULLERJAHN/FICKR

SUBMISSIONS TO

Point Nepean National Park

Application for Permit P35431 - P3543 Point Nepean Defence and Quarantine Precinct

Planning Scheme Amendment C309morn to facilitate the development of the Point Nepean Research and Education Field Station

Victorian National Parks Association

Level 3, 60 Leicester Street, Carlton VIC 3025 • 03 9341 6500 • vnpa@vnpa.org.au • vnpa.org.au

ABN 34 217 717 593

31 March 2025

Development Assessment
Minister for Planning
GPO Box 2392
Melbourne VIC 3001
development.assessment@transport.vic.gov.au

Dear Sir/Madam

Re: Planning Scheme Amendment C309morn to facilitate the development of the Point Nepean Research and Education Field Station in the Point Nepean Quarantine Station complex

Thank you for the opportunity to comment on the above amendment, which has been applied for by Urbis Pty Ltd on behalf of Monash University and the University of Melbourne (from herein 'The Applicants') to facilitate their development of the Point Nepean Research and Education Field Station as part of their National Centre for Coasts and Climate based at the School of Biosciences in Melbourne.

Were the amendment to be approved, The Applicants would proceed with works comprising the repurposing of Badcoe Hall, the construction of a two-storey accommodation building behind it to accommodate visiting students and staff, and the installation of associated services and hard and soft landscaping comprising paths, stairs, at-grade car parking, tree removal and new planting.

In this submission we urge the Minister for planning not to approve the planning amendment and for her to ask The Applicants to amend the proposal so that it focuses on the adaptive re-use of the existing heritage buildings of Primary Significance, and to ask Parks Victoria and The Applicants to renegotiate the lease to cover an alternative site. That should be accompanied by meaningful consultation and engagement conducted between Heritage Victoria, Parks Victoria, The Applicants, the Point Nepean Advisory Group, VNPA, the National Trust and the Nepean Conservation Group.

In brief, the reasons for our request to the Minister are:

1. the lack of justification for the Minister calling in the amendment. The explanatory report with the supporting documents indicates that the call-in power has been used to 'accelerate' the project because it is of 'national' and 'state significance'. This highly exaggerates the status of the field station, which is part of a 'National Centre' that was originally given its title by the former member for Flinders Greg Hunt so that it would be an impressive addition to his electorate
2. the Ministerial call-in prevents community engagement and consultation in the development and use of the field station. Any development plans for construction management, early works, environmentally sustainable design, water sensitive urban design, waste management plan, transport management plan, landscape plan, vegetation management and protection plan, bushfire and signs 'must be submitted to and approved by the Minister for Planning in consultation with Mornington Peninsula Shire Council.' This, and the exemption from a planning permit, means that the community, should the amendment be approved, will be shut out of any engagement in the development and use of the field station.

3. the absence of a business case, although The Applicants in 2020 said they were preparing one¹
4. the absence of the lease agreement between Parks Victoria and The Applicants in the supporting documents
5. the rejection by The Applicants of the adaptive re-use of heritage buildings of Primary Significance and their use of taxpayer funding to build a new building and retrofit Badcoe Hall. This will inevitably consign the heritage buildings of Primary Significance to neglect and ruin. It is highly unlikely that any new funding will be raised from cash-strapped governments to maintain, repair and adaptively re-use these heritage buildings, thus undermining the prime aim of park management in the Point Nepean National Park's Quarantine Station
6. the limited and skewed consultation (mostly information sharing), highlighted by the recent consultation debacle which solely comprised a notice stuck on the door of Badcoe Hall announcing an application for a permit from Heritage Victoria and accidentally found by members of the Nepean Conservation Group
7. the lack of any consideration of the impacts that increased traffic and lighting could have on the native fauna of Point Nepean National Park.

The Applicants received \$17m of government funding from the Morrison Government and this should now be used to provide the best outcome for the conservation of the heritage buildings in the Quarantine Station and for the broader Point Nepean National Park. That outcome should not involve the construction of a new building, which would be a lost opportunity for the sustainable activation of the Quarantine Station and its heritage buildings.

Simply put, the proposed Point Nepean Research and Education Field Station is in the wrong place at the Quarantine Station. The sensitively designed adaptive re-use of Hospital Buildings 1 and 2, used in 1998-99 to house the Kosovo refugees and having a similar floor plan to the proposed accommodation building, and the First-Class Dining Room, nearby cottages and the Medical Superintendent's Quarters would together form an excellent education and research precinct with easy access through Police Point. Curiously these buildings were ignored by The Applicants when reviewing the potential use of several heritage buildings of Primary Significance. A second option would be to use Hospital Buildings 3, 4 and 5 as multiple accommodation buildings within easy walk of Badcoe Hall and the main car park.

This submission provides more detail in support of our request that the Minister not approve the Mornington Peninsula Shire Planning Scheme Amendment C309morn and that she insists that The Applicants find another site in the Quarantine Station that adaptively re-uses the heritage buildings of Primary Significance.

Yours faithfully



Matt Ruchel
Executive Director
Victorian National Parks Association

¹ Monash University 2020 'University Research Hub one step closer for Point Nepean
<<https://www.monash.edu/news/articles/university-research-hub-one-step-closer-for-point-nepean>>.

A submission by the Victorian National Parks Association on Planning Scheme Amendment C309morn

1. VNPA's ongoing interest in the future of Point Nepean National Park and its Quarantine Station

The VNPA has maintained a very keen interest in the future of Point Nepean's natural and cultural heritage for more than 20 years. That interest began when we coordinated the statewide Save Point Nepean campaign for the area to be protected within an integrated national park. The campaign was supported by the National Trust and was driven locally by the Nepean Conservation Group.

The campaign succeeded in having the final Commonwealth land returned to Victoria in 2009 by the Rudd Government, followed by the establishment of the Point Nepean National Park. The campaign was successful because of widespread community support for an outcome that would see the park used for the conservation of natural and cultural heritage, environmental research, education and interpretation, ecologically sustainable tourism and recreation and the effective and appropriate adaptive re-use of the many empty heritage buildings of Primary Significance in the Quarantine Station.

Throughout the campaign and since we have been confronted by various development proposals for the national park, and especially for the Quarantine Station. Most were poorly designed, inappropriate for the area, and lacked business plans. This has also been true since 2007 for the various iterations of the National Centre for Coasts and Climate (NCCC), the proposed field station of which is now the subject of the application for the planning amendment.

VNPA has always encouraged the establishment of research and education facilities in the Point Nepean National Park's Quarantine Station. This was a key focus of the Community Expression of Interest on a living museum that it co-authored with the National Trust in 2003. But any research and education facilities, and other site activation, should be in the many empty heritage buildings of Primary Significance, not in new buildings. However, the development of a new building near Badcoe Hall was regrettably given impetus when Parks Victoria included it in the 2017 Point Nepean National Park Master Plan and the agency's subsequent lease agreement (not publicly available) for the land that is the subject of this amendment. Both actions by Parks Victoria have undermined what should be the prime focus of park management in the Quarantine Station of the Point Nepean National Park, the adaptive re-use of heritage buildings of Primary Significance. The proposed Point Nepean Research and Education Field Station is in the wrong place.

2. The planning amendment process and the Ministerial call-in

According to the Department of Transport and Planning website, the 'Minister for Planning has received a request from Urbis Pty Ltd on behalf of Monash University and the University of Melbourne for accelerated assessment via the Development Facilitation Program. The Development Facilitation Program is an assessment pathway for priority projects in identified sectors to inject investment into the Victorian economy, keep people in jobs and create homes for people. All applications lodged to the DFP will be determined by the Minister for Planning or the Department of Transport and Planning under delegation.'²

The Department of Transport and Planning website also states that 'the draft amendment proposes to make changes to the Mornington Peninsula Planning Scheme by introducing a Specific Controls Overlay to land at 3880 Point Nepean Road, Portsea (Crown Allotment 2039, Parish of Nepean), and other consequential changes to the Mornington Peninsula Planning Scheme to facilitate the development of the Point Nepean Research and Education Field Station, a Nationally and State Significant facility to be located within the historic Point Nepean Quarantine Station complex.'³ The

² Department of Transport and Planning 2025 Draft Planning Scheme Amendment C309morn, <https://engage.vic.gov.au/draft-planning-scheme-amendment-c309morn> Accessed 27 March 2025

³ Department of Transport and Planning 2025 Draft Planning Scheme Amendment C309morn, <https://engage.vic.gov.au/draft-planning-scheme-amendment-c309morn> Accessed 27 March 2025

amendment would also incorporate the document, Point Nepean Research and Education Field Station March 2025, into the planning scheme.

A Specific Controls Overlay (SCO) applies specific controls to land to ensure certain desired outcomes for the use and development of land. The purpose of the incorporated document is: 'To facilitate the use and development of the land identified in Clause 3 for demolition, bulk excavation, and the use and development of the land for a research and education facility (research centre and education centre) and other complementary uses including accommodation, car parking reduction, the erection and display of signs and associated buildings and works generally in accordance Clause 4.0 of this document.'

Clause 4.0 is about 'Control' with Clause 4.1 exempting the field station development from the requirements of the Mornington Peninsula Planning Scheme: 'No planning permit is required for, and no provision in the Planning Scheme operates to prohibit, control or restrict the use or development of the land in accordance with the provisions contained in Clause 4.0.'

The remainder of Clause 4 indicates that any development plans for construction management, early works, environmentally sustainable design, water sensitive urban design, waste management plan, transport management plan, landscape plan, vegetation management and protection plan, bushfire and signs must be submitted to and approved by the Minister for Planning in consultation with Mornington Peninsula Shire Council. This, and the exemption from a planning permit, means that the community, should the amendment be approved, will be excluded from any engagement in the development of the field station. The repurposing of one building and the construction of another hardly requires the use of the call-in powers.

Although the aim of the Development Facilitation Program to create homes for people would not be satisfied wherever the field station was located, investment injection and keeping people in jobs would be satisfied by the alternative location that we have proposed. Its aims would also be satisfied were the field station located somewhere beyond the national park. If it were built outside the park, the field station would be far less noteworthy and simply be an accommodation building for students and staff along with ancillary functions, something akin to the Lord Somers Camp. But by being proposed for inside the national park, its location should support the park's objects. Point Nepean National Park is unique because it includes the most heritage buildings of any national park in Victoria. The prime focus of its management in the Quarantine Station is the adaptive re-use of the heritage buildings of Primary Significance.

3. Is the proposed Point Nepean Research and Education Field Station 'a Nationally and State Significant facility'?

The Minister has justified the call-in of the planning amendment to 'accelerate' the facilitation of the field station because she has deemed it to be 'a Nationally and State significant facility.' But is it? What are its origins?

The University of Melbourne was not the first to propose a 'national centre' in the Quarantine Station of the Point Nepean National Park. In 2003 the Australian Maritime College (AMC), with the support of the local federal member, Greg Hunt, began its preparations to establish what he and AMC had dubbed the National Centre for Marine and Coastal Conservation, and for which he had secured substantial funding from the Howard Government. However, by 2007 this project had collapsed and, to save face for Mr Hunt and the federal government, the University of Melbourne was approached to take over from the AMC. The University eventually agreed, and the National Centre for Coasts and Climate (NCCC) began its evolution although it was not formally established until 2015.⁴⁵

Since the announcement, the NCCC has had several iterations and in 2020 Monash University joined the University of Melbourne in its endeavours. The proposed field station is an adjunct to the NCCC, which is essentially a research team based at the University of Melbourne (School of BioSciences) and at Monash University (Coastal Research Group – Science), and which has one director, six academics, four post-doctoral fellows, five PhD candidates and five masters' students. The School of BioSciences

⁴ These developments predated the return of the Commonwealth's Quarantine Station land to Victoria in 2009 by the Rudd Labor Government, and the establishment of the integrated Point Nepean National Park National Park.

⁵ <https://nccc.edu.au/about/> Accessed 27 March 2025.

has 'over 200 students studying at undergraduate, masters, and PhD levels.'⁶ The website also states that the NCCC is 'is engaging with key stakeholders to identify important problems related to climate change impacts in the coastal zone to undertake interdisciplinary research that provides practical solutions to these challenges.'⁷

Undergraduate students most likely to visit the field station are those studying majors in marine biology, geography and ecosystem science or completing the Master of Environmental Science. The field work covered at the field station could include 'research into dune management, coastal erosion and inundation, marine ecosystem preservation, pollution control, biodiversity conservation to provide opportunities to secure threatened flora and fauna, habitat restoration and management of Indigenous and settler heritage sites at risk of sea-level rise.'⁸

Recent funding for the NCCC to establish the field station comprised \$17m from the Morrison Federal Government and \$8m from the two universities⁹, which covers the funding cut by the incoming Albanese Government in 2022.

But is the proposed field station 'a Nationally and State Significant facility'? Universities from around the country are heavily engaged in marine, coastal and climate issues with undergraduate degrees, research centres, field work, study tours and lab-based research that involves academics, undergraduates, postgraduates and research staff. Some examples follow:

- Western Australia: University of Western Australia has the UWA Ocean Institute and the Indian Ocean Marine Research Centre, while Curtin University has the Centre for Marine Science and Technology
- South Australia: at Flinders University there are the Lincoln Marine Science Centre and the Marine and Coastal Research Consortium, while the University of Adelaide has the Sustainable Marine and Coastal Futures program
- New South Wales: the University of NSW has the Centre for Marine Science and Innovation, while multiple universities are partnered in the Sydney Institute of Marine Science
- Queensland: James Cook University has the Orpheus Island Research Station, Griffith University the Coastal and Marine Research Centre, and the University of Queensland has field stations on the Great Barrier Reef and in the Coral Sea
- Northern Territory: Charles Darwin University has a marine research partnership with the Australian Institute of Marine Sciences
- Tasmania: The University of Tasmania has the Institute for Marine and Antarctic Studies which has three core research programs in Fisheries and Aquaculture, Ecology and Biodiversity, and Oceans and Cryosphere
- Victoria: Deakin University has the Marine Research and Innovation Centre and the Queenscliff Marine Science Centre, while Monash University and the University of Melbourne have their NCCC
- Canberra: The Australian National University has courses in marine and coastal law and marine science but also the Kioloa Coastal Campus, its coastal field station since 1975 that supports short and long-term research projects, undergraduate/postgraduate field trips and other cultural and educational activities. Groups also visit the campus for conferences, retreats, workshops, seminars and meetings.
- National: the Australian Institute of Marine Sciences is a world leader in tropical marine research, while the research by the participants in the National Environmental Science Program Marine and Coastal Hub's is informing management of Australia's marine and coastal environments, including estuaries, coast, reefs, shelf and deep-water.

Clearly the proposed field centre and NCCC research is not unique. It is just that the other universities have not dubbed their research facilities 'national', while the National Environmental Science Program

⁶ <https://biosciences.unimelb.edu.au/study>
<https://biosciences.unimelb.edu.au/#:~:text=We%20cultivate%20a%20vibrant%20community,%2C%20masters%2C%20and%20PhD%20levels.>

⁷ <https://nccc.edu.au> Accessed 27 March 2025

⁸ <https://www.mpnews.com.au/2023/05/08/universities-help-pay-for-pt-nepean-field-station/>

⁹ <https://www.mpnews.com.au/2023/05/08/universities-help-pay-for-pt-nepean-field-station/>

Marine and Coastal Hub is truly 'national' as it is a partnership of 28 universities and other organisations involved in marine and coastal research.

Of special interest for Victoria is Deakin University's Marine Research and Innovation Centre, which as part of Deakin Marine Science offers programs on 'blue carbon, aquaculture, ocean life and resources, coastal and people' and is involved with the Integrated Marine Observing System and the Victorian Coastal Monitoring Program, as well as the Deakin Marine Mapping Group.¹⁰ The Bachelor of Marine Science undergraduate degree is the only dedicated undergraduate marine science degree in Victoria and will use the Queenscliff Marine Science Centre to provide unique experiential learning experiences for students. The \$3.5million project is being supported by Deakin and the Victorian Government's Higher Education State Investment Fund (VHESIF).¹¹

Deakin's Queenscliff Marine Science Centre is housed in a six-star sustainable building that was, save for the Marine and Freshwater Discovery Centre's school programs, essentially abandoned by the Victorian Government when it gutted fisheries scientific research. It also has 'state-of-the-art aquarium facilities, a new high-performance computing laboratory, and modern audio-visual and conferencing facilities.'¹²

Curiously, on page 18 the Lovell Chen Heritage Impact Statement states the following on the focus of research at the NCCC:

'The proposed use of part of the former Point Nepean Quarantine Station for targeted research is driven in large part from a marine perspective. Point Nepean is situated close to a diversity of marine environments, from the shallow protected waters of the bay to the exposed rocky reef habitat on the exposed coast. The location provides unique research and teaching opportunities that are unavailable in other locations or within the existing university campuses and will allow for intensive study of unique marine biology in this location.'¹³

Deakin University appears to be well ahead of The Applicants on marine research and education, which again casts doubt on the significance of the proposed field station. Why should the needs of the Point Nepean National Park and the sustainable future of the heritage buildings of Primary Significance be so clearly ignored for a research and education effort that is one of many across Australia?

4. Rejection of adaptive re-use of heritage buildings of Primary Significance by The Applicants

The planning amendment is predicated on the repurposing of the Badcoe Hall for administration, classes, social spaces, kitchens, dining and laboratories and the construction of a new accommodation building behind it to provide overnight accommodation for 50 students and staff of 1-3 days (and potentially 1-3 months using two rooms with ensuites).

After a request from Heritage Victoria for heritage buildings of Primary Significance to be considered as alternative sites for the field station, The Applicants commissioned the Heritage Impact Statement from Lovell Chen. This statement briefly considered Hospital Buildings 3, 4 and 5, the Isolation Hospital Complex at the western end of the precinct, and the two Officer Cadet Accommodation buildings near Badcoe Hall. The statement dismissed their adaptive re-use. The stated reasons (underlined) and our comments follow:

A. The buildings in the western end of the precinct are too far from Badcoe Hall

This is a very weak argument as the precinct's various heritage buildings of Primary Significance are easily accessible on foot, and university students are well used to walking between buildings on their campuses. Based on the Traffic Impact Assessment by Traffix Group, which was commissioned by The Applicants, those same students, who apparently will be bussed to the main car park at the Quarantine Station, will be walking approximately 300 metres from that car park to Badcoe Hall and the new accommodation building. The repurposing of Badcoe Hall would appear to be giving

¹⁰ <https://www.deakin.edu.au/research/research-partnerships/deakin-queenscliff-marine-science-centre>> Accessed 27 March 2025.

¹¹ Ibid.

¹² Ibid.

¹³ Lovell Chen 2025 Point Nepean Research and Education Field Station Heritage Impact Statement

convenient support for The Applicants' contention that the new accommodation building needs to be close to Badcoe Hall rather than in other parts of the precinct. But if one or more heritage buildings of Primary Significance were adaptively re-used for the functions planned for Badcoe Hall, and others were used for accommodation, their argument for a new building based on walking distances fails.

B. The heritage buildings of Primary Significance would cost too much to be adaptively re-used for what the Field Station requires or, in the case of one of the Officer Cadet buildings, is in too poor a condition.

VNPA has never thought that the adaptive re-use of the heritage buildings at Point Nepean would be cheap. But these are important buildings of Primary Significance. Their adaptive re-use, designed in a way that conserves them, is critical for the long-term future of the Quarantine Station and Point Nepean National Park. The substantive government funding granted to the field station should be used for that purpose and the Government Architect should be engaged to advise on adaptive re-use.

C. The heritage buildings of Primary Significance would not allow for the proposed accommodation configuration for the field station because it would remove their internal fabric.

We note that the research aims for the research station have been reduced and the proposed accommodation significantly increased. Badcoe Hall would be used for administration, classes, social spaces, kitchens, dining and laboratories, while the new building would be exclusively for accommodation. An earlier plan was for 25 students to be accommodated in the upper floor of Badcoe Hall.¹⁴

The configuration of accommodation is only supplied in a plan view of the proposed new building and appears to comprise rows of small rooms with shared bathroom facilities. This is like the floor plans of Hospital Buildings 1 and 2, which were ignored by the Lovell Chen Heritage Impact Statement. There are no other details as to why that is the preferred configuration other than it would be to house 50 students and staff.

Hospital Buildings 3, 4 and 5 were also considered but for Lovell Chen number 5 was too far away from Badcoe Hall and its use would not achieve 'target accommodation', while number 3 and 4 had rooms that were double the size of those planned for the new accommodation building. The simple solution would be to use multiple hospital buildings to meet the 'target accommodation'. Lovell Chen also cited safety concerns for students walking at night between these buildings and Badcoe Hall. That distance would only range from 150 metres from building number 3 to 350 metres from number 5! By comparison, the walk from the car park to be used by buses transporting students to the area is at least 300 metres. And the walk from the car park to building numbers 3, 4 and 5 is between 100 and 150 metres.

The Applicants are happy to gut and destroy the internal fabric of the Badcoe Hall in a comprehensive repurposing but have used the need to conserve the internal fabric of the heritage buildings of Primary Significance as an argument against their adaptive re-use.

VNPA believes that the focus of the planning and management of the Quarantine Station should be the adaptive re-use of the heritage buildings of Primary Significance, not the construction of new buildings. The applicants should be required to adjust the accommodation configuration of the field station to fit within the internal conservation needs of the heritage buildings of Primary Significance.

The Applicants' view is that if the heritage buildings of Primary Significance cannot house 50 students and staff, then those buildings are not worthy of consideration. However, if multiple heritage buildings were used for accommodation, that would satisfy their needs and not cram 50 students and staff into one building. Hospital Buildings 1, 2, 3, 4 and 5 could be part of a multiple-buildings option.

¹⁴ See Parks Victoria letter of 22/8/2024 in the supporting documents accompanying the application.

D. Parks Victoria has other plans for one of the Officer Cadet Accommodation buildings and the isolation hospital complex, and the other Officer Cadet Accommodation building could be demolished.

The statement provides no details on how serious and advanced the proposals are by Parks Victoria.

The Lovell Chen Heritage Impact Statement made no mention of why The Applicants did not consider Hospital Buildings 1 and 2 and the associated First-Class Dining building, as well as the nearby Pike and Cox cottages and the Medical Superintendent's Quarters. Perhaps it was because many years ago it was suggested they be used for high-class hospitality. That idea has never been realised. The sensitively designed adaptive re-use of these buildings would form an excellent education and research precinct with easy access through Police Point. These buildings were used to house refugees in 1998-1999 and have a floor plan not dissimilar to what is proposed for the upper floor of the proposed new accommodation building. A second option would be to use Hospital Buildings 3, 4 and 5 as multiple accommodation buildings within easy walk of Badcoe Hall.

The Urbis Town Planning Report, one of the supporting documents to the application for the planning amendment, uses several quotes from page 25 of the 2017 Point Nepean National Park Master Plan to imply what the field station can achieve:

'Of relevance to the site, the Masterplan seeks to: "Conserve and interpret the Quarantine Station's powerful heritage landscape of 19th century hospitals, accommodation and disinfecting buildings to convey its stories of passage, 'in between-ness' and control".'

By focusing on a new building and the repurposing of Badcoe Hall, the proposed field station will do nothing to conserve the 19th century hospitals, accommodation and disinfecting buildings. In fact, it will likely do the opposite.

Page 25 of the town planning document again quotes the master plan to justify the proposed new building and the repurposing of Badcoe Hall:

'Importantly, the 2017 Masterplan directly supports the proposal as follows:

Identifies Badcoe Hall as of secondary heritage significance that will accommodate an education and research focus for activation (including research and public education facilities and student accommodation).

Identifies an opportunity for a new building to the south of Badcoe Hall (Building B in the below figure).'

The Master Plan's inclusion of a new building severely undermined its integrity and ignored a prime object of the national park, which is to adaptively re-use the heritage buildings of Primary Significance.

The Lovell Chen Heritage Impact Statement briefly describes the various iterations of the field station over the years and then makes the following comment about Heritage Victoria's support:

'For an earlier iteration: Pre-application comments provided by Heritage Victoria in August 2023 indicated that the substantially reduced scale and footprint of the new building was considered to be a 'positive outcome', with a 'level of comfort' regarding the adaptation and internal changes to Badcoe Hall to allow a smaller footprint for the new building.'

'For the current iteration: Pre-application comments provided by Heritage Victoria in February 2024 confirmed there is a 'level of comfort' with the proposed works, and indicated that the removal of the potential for harm to any maritime archaeology is considered a good outcome for the place.'

There is no clarification of the very vague term 'level of comfort' ascribed to Heritage Victoria. Is it a low, medium or high level of comfort? Although expert in heritage buildings, Heritage Victoria has no claimed expertise in the management of national parks. That would be Parks Victoria, but unfortunately the park agency acquiesced on the proposed development by including a new building site in the 2017 master plan and signing a lease for the site with The Applicants. It should be noted, however, that the 2017 master plan's priority for a new building involved the demolition of both Officer Cadet Accommodation buildings (site A) and the construction of a new building on their footprint. The site behind Badcoe Hall was site B.

5. Confusion over Badcoe Hall's heritage significance

Badcoe Hall was built in 1963 and named after Major Peter Badcoe, a posthumous VC winner who trained at her Officer Cadet School in the Quarantine Station. In an appendix to the 2008 Conservation Management Plan, which listed buildings of Secondary Significance, Badcoe Hall is 'a building of limited architectural interest.'¹⁵ It is only given Secondary Significance status due to it being one of a collection of buildings that help to demonstrate the post-WWII Army use of the Quarantine Station.¹⁶ This period was remarkable for the damage caused to the heritage landscape and the internal fabrics of the heritage buildings of Primary Significance.

The Applicants make much of their proposal to repurpose Badcoe Hall, which they describe as having heritage significance, to deflect any calls for the heritage buildings of Primary Significance to be adaptively re-used. In their eyes, the repurposing of Badcoe Hall is sufficient to satisfy any park objective for adaptive re-use. However, they are somewhat confused about the hall's significance.

On page 32 of the Urbis town planning report, one of the supporting documents for the planning amendment application, it is stated that:

'As outlined above, the adaptive re-use of Badcoe Hall is of significant benefit to the community which will prolong the use of this historic building into the future and ensure retention of its important heritage aspects.'

And yet on the following page 33 of that report states that:

'Badcoe Hall is not identified in the Victorian Heritage Register extent of registration and is identified only as an element of secondary significance, thereby allowing greater flexibility with regard to alteration and adaption. Lovell Chen have confirmed that the proposed alterations will not substantially change the external presentation or detailing of the building.'

It is clear from the description of Badcoe Hall in the 2008 Conservation Management Plan that it is not a particularly historic building and has little in the way of important heritage aspects. But on page 32 of the town planning report it is an historic building, the repurposing of which is of significant benefit but on page 33 it is now no longer of great significance, which means repurposing is justified.

6. The Applicants' focus on the field station's lease area ignores the broader national park

The Applicants commissioned several reports to support their application and these include an arborist report and cultural heritage management plan, and reports on ESD, flora and fauna, traffic, waste and town planning, as well an explainer of the amendment. Most of these focus on the site of Badcoe Hall and the proposed new building with little to no consideration of the potential impacts that such a facility could have on the broader Point Nepean National Park. Here we comment on aspects of four of these documents.

Mornington Peninsula Planning Scheme Amendment C309morn Explanatory Report

The explanatory report is a glowing endorsement of the application, with no mention of the potential impacts of the proposal on the national park or the missed opportunity to locate the field station services in an existing set of heritage buildings of Primary Significance. The great challenge for the national park, which contain the Quarantine Station, is to find sustainable uses for the heritage buildings. The desire of The Applicants to construct a new building will expose the heritage buildings of Primary Significance in the Quarantine Station to neglect and decay.

Pages 4 and 6 of the explanatory report make several assertions that cannot go unchallenged. Here we cite these (underlined) followed by our comments:

'Provides for the adaptive re-use of a significant heritage building that supports collaboration, participation education and activation' and 'The adaptive re-use of an existing building and construction of a new building will reinvigorate the site, activate the area and contribute to the research and educational offering of Victoria.'

¹⁵ Point Nepean Conservation Management Plan 2008 Volume 2 Appendix D-G

¹⁶ Point Nepean Conservation Management Plan 2008 Volume 2 Appendix D-G.

Badcoe Hall is only a building of Secondary Significance because it, along with several others, was built in the 1960s and represents that period of Army occupation. It was a period of architectural and landscape destruction by the Army.

Any potential for adverse effects on listed marine biodiversity and heritage values will be readily addressed through the planning and other statutory consent processes.

There is no mention of coastal and terrestrial biodiversity, which The Applicants claim is a focus of the field station. And which processes? This amendment has been called in by the Minister so there is no opportunity for community engagement during development of the site and the associated planning processes.

The proposal will create new and on-going employment opportunities associated with the development as well as through the construction period.

The project would also do that if it was in an adaptively re-used heritage building of Primary Significance or on a site outside the national park.

The public realm will be enhanced through contemporary and refurbished buildings and landscaping, and improved accessibility.

This sounds more like an urban renewal project rather than the sensitive use of an area of significant heritage buildings and history.

The proposal is sensitively designed in response to the site's natural environment and is unlikely to result in unreasonable environmental impacts.

It would be far more sensitive if the field station did not involve a new building when there are many empty heritage buildings of Primary Significance in need of adaptive re-use – and funding.

The proposal incorporates an overall traffic strategy to ensure no adverse impacts arise from a traffic perspective and all traffic movement and car parking can be appropriately managed.

A very short section in the Traffix report provides very limited information on vehicular access to the Quarantine Station. There are no details on how many buses will visit the Quarantine Station each year, or the number of academic and ancillary staff cars, or whether there will be any restrictions on the timing of their entry i.e. will it be 24/7? If so, what of the impacts of nocturnal animals crossing roads.

Traffic Impact Assessment by Traffix Group

Only five paragraphs on traffic movements appear in the Traffix Group's Traffic Impact Assessment of 38 pages, with most of the report dealing with car parking. Under a subheading of 'Traffic Impacts, the report states:

The proposal includes 13 on-site car spaces primarily utilised by staff of the research facility and patrons of Badcoe Hall. Staff will generate trips on arrival and departure and throughout their stay associated with errands etc.

Students will be bused to and from the Quarantine Station Carpark and university campuses, reducing the traffic impacts.

There will be times when Badcoe Hall will be used by community groups for functions up to 200 patrons, which are anticipated to be infrequent (currently monthly). On the basis that traffic associated with Badcoe Hall occurs at the same rate as the statutory car parking requirement (0.3 trips per car space), an event of up to 200 patrons could be expected to generate 60 vehicle trips within an hour.

Given the one-way nature of the local road network, all vehicles will access the site via Franklands Drive and Jacksons Road. On exit, vehicles will continue along Jacksons Road onto Ochiltree Road and Defence Road before exiting back onto Point Nepean Road. This arrangement is unchanged from how vehicles currently access the site, and is considered appropriate.

We are satisfied that the traffic impacts of the proposal would be low and can be accommodated by the existing road network within Point Nepean National Park.¹⁷

¹⁷ Traffix Group 2024 Traffic Impact Assessment.

The Traffix report is more about how traffic affects other traffic and the capacity of car parks. It does nothing to allay our concerns about the impacts of vehicular traffic. Nor does it provide any estimate of the number of bus trips and private vehicle counts associated with the operation of the field station. The report indicates that currently: Point Nepean National Park is open daily. Vehicles can enter via Defence Road between 7am–5pm (6am–6pm in daylight savings) and exit at any time.’ However, there is no mention of whether these times will be altered to enable access between dusk and dawn to accommodate the bus and car movements of academic staff, students and other visitors. Night-time traffic will impact nocturnal animals as they cross the roads. There should be no traffic allowed between dusk and dawn to protect nocturnal animals, wherever the field station is sited.

The estimate of 200 patrons at an event in Badcoe Hall would seem to be overstated but the Urbis Town Planning Report on page 12 also states that: ‘Badcoe Hall will also continue to be used as a gathering space for the local community as well as the universities, with the capacity to accommodate up to 200 people if required.’ However, on page 16, the Lovell Chen Heritage Impact Statement describes what will be done to Badcoe Hall, which will make it very difficult to reach those numbers:

‘Internally, all of the walls and fitout will be removed including three sections of the existing concrete slab to enable the introduction of vertical access (stair and lift) within the existing building footprint. The new building fitout will comprise research, teaching and gathering spaces as well as amenities and support areas on both levels of the building.’

This also casts doubt on the community access to the ‘hall’ part of Badcoe Hall promised by The Applicants but which under their repurposing plans will no longer exist.

Point Nepean Research and Education Field Station Project ESD Report by aurecon

The ESD report is largely about the performance, energy use, waste management during repurposing/construction of Badcoe Hall and the proposed new accommodation building, and indoor environmental quality. Lighting is also referred to – ‘Good quality electrical lighting for all spaces’ –but largely about its energy efficiency. There is no mention of the potential impact that lighting of the buildings and surrounding area could have by attracting and disorienting native insects, birds and bats. Any lighting should be designed to minimise those impacts.

The Urbis Town Planning Report states on page 23 that the ESD report nominates the proposed Stormwater Management Strategies for the proposed development. Clause 53.18 Stormwater Management in Urban Development in the Mornington Peninsula Shire planning Scheme seeks to ensure that stormwater in urban development, including retention and reuse, is managed to mitigate the impacts of stormwater on the environment, property and public safety, and to provide cooling, local habitat and amenity benefits. However, there is no mention of either stormwater or sewerage in the aurecon ESD report or in its Operational Waste Management Plan.

Although one of the areas of study at the field station will be climate change, the aurecon report only very briefly (five paragraphs in a 72-page report) discusses the issue and lists eight risks posed including increased temperatures, more hot days, more intense rain events and a ‘high confidence of sea level rise’. However, it only concludes this one-page section with: ‘The “building fabric first” approach supports a more stable internal temperatures which will withstand the increasing temperatures caused by the changing climate.’

In recent years Port Phillip Bay’s shoreline along Point Nepean has suffered significant erosion from storms, channel shifts and rising sea levels. Badcoe Hall and the proposed new building site are on land at relatively low elevations. A sea level rise of at least 1.2 metres this century, which is projected by McInnes and Zhang (2024) for the Victorian coast¹⁸, coupled with storm surge, could lead to significant erosion and potential flooding of the Parade Ground in front of the field station and potentially place it at some risk. That is another good reason for locating the proposed development to the higher ground where Hospital Buildings 1 and 2 are located.

The aurecon report also provides an update on the Sustainability Action Plan of The Applicants, which is again focused on the development site rather than the broader national park. The plan covers a

¹⁸ McInnes, K.L., and Zhang, X., 2024: Updated Sea-level Projections for Victoria. CSIRO Environment report for Department Environment, Energy and Climate Action, Vic. 52 pp.

series of actions under cultural heritage, low impact materials, zero carbon, natural habitats for wildlife and people, zero waste, sustainable water and health and happiness.

Preserving and Celebrating Existing Built Heritage: As a Victorian Heritage Registered building with architectural and historical significance to the State of Victoria, Badcoe Hall, will be retained and upgraded where possible. On track. A Heritage Impact Statement has been prepared for the project by Lovell Chen. The proposal complies with the Conservation Management Plan.

A search of the Victorian Heritage Register reveals that Badcoe Hall is not 'a Victorian Heritage Registered building with architectural and historical significance.' The 2008 Conservation Management Plan says the same.

Preserving and Celebrating Existing Ecological Value: Refer Natural Habitats for Wildlife and People On track. A Flora and Fauna Assessment has been prepared for the project by Biosis. There are no impacts from the removal of native vegetation. And the development is deemed to pose very little risk to threatened species and ecological communities. All major existing trees to be retained and integrated into the landscape design. In progress. An Arboricultural Assessment and Report has been prepared for the project by Tree Logic.

Increasing Ecological Value: Selection of native planting as much as possible to both increase biodiversity and also decrease irrigation demands. On track.

Wherever the field station is built, The Applicants should take a broader view of their location within Point Nepean National Park and consider stewardship actions that they could take, in partnership with park rangers, their students and volunteers. Stewardship actions could include the removal and control of environmental weeds and invasive pests, and the planting of indigenous species for habitat restoration, to preserve and celebrate the park.

Point Nepean Research and Education Centre: Flora and fauna assessment by biosis

The flora and fauna report also largely focusses on the field station site although it does list threatened flora and fauna that could occur in Point Nepean National Park. However, by ignoring the native fauna that is not listed, it downplays the potential impact of the field station's operations, especially on native mammals.

The 2009 Point Nepean National Park Management Plan lists terrestrial mammals potentially living in the national park as the agile antechinus, Gould's wattle bat, southern brown bandicoot, lesser long-eared bat, long-nosed bandicoot, sugar glider, swamp rate, white-footed dunnart, short-beak echidna, little forest bat and black wallaby as possibly occurring in the park.

The biosis report fails to mention that the vehicular access to the main car park and the field station site could impact nocturnal animals, while the lighting associated with the buildings could attract and disorient native bats, insects and birds.

The flora and fauna report also lists 32 introduced plant species but there is no mention in any of the reports of planned efforts to control these. A condition of any lease in the Quarantine Station should be actions by the lessees to remove and control environmental weeds.

There is also no mention in any of the documents associated with the application on whether The Applicants will be seeking the construction of a new jetty to provide moorings for research vessels and other craft. VNPA has opposed such a proposal since it was first raised because it would significantly increase vessel traffic within a dolphin sanctuary. It is time for the jetty proposal to be scrapped by the Victorian Government.

7. Sporadic and skewed consultation

Page 16 of the town planning report states that: 'The universities are committed to active, consistent and authentic stakeholder engagement for the PNREFS and have set up a website to provide the community the latest information on the project and provide a summary of consultation opportunities.' But the emphasis is here is on information not consultation, participation or engagement.

The most recent example of poor consultation by The Applicants occurred when they applied for a Heritage Victoria permit to enable demolition, tree removal, construction, conservation and landscaping (including parking) for the proposed field station. This failure by Heritage Victoria and The Applicants to engage with the key groups has been compounded most recently by how the application for a Heritage Victoria permit was announced. A notice was stuck on the door of Badcoe Hall and which would appear to be the only source of community information about the application. It was discovered by chance when the Nepean Conservation Group held its AGM at Badcoe Hall two days prior to the closing date for submissions. There were no public meetings, community consultations or community conversations held by either Heritage Victoria or The Applicants in relation to the heritage permit application. Nor was the community made aware of the architectural drawings or reports accompanying the application.

The Heritage Impact Statement by Lovell and Chen indicated that for the heritage permit application, pre-application discussions had been held between Heritage Victoria and The Applicants as far back as 2021, and that other planning processes had also been in train. In that context we were surprised and disappointed that Heritage Victoria and The Applicants failed to consult with key stakeholders such as VNPA, the National Trust and the Nepean Conservation Group. Point Nepean National Park is too important for significant decisions such as these to be conducted behind closed doors. The same can be said about the negotiations or and the preparation and signing of the site lease between Parks Victoria and The Applicants.

The Urbis Town Planning Report describes some of the consultation that has been conducted by The Applicants including 'Targeted feedback has been sought from the community and key stakeholders on the project since 2021. This has included community surveys, stalls at the Point Nepean Market, flyer drops and community briefings.' But on page 16 it also claims: 'Consultation began in 2010 with the drafting of the Point Nepean National Park Masterplan and continues to be undertaken by the universities to keep the community informed about this project.' This implies that The Applicants conducted that consultation. However, that consultation and for a later master plan released in 2017, was organised by Parks Victoria not The Applicants.

The Urbis report also lists the consultations that The Applicants have undertaken from 2022 to March 2024 in Appendix B. It should be noted that in 2023 the proposal was substantially changed. There was a reduction in the scale of the field station, but an increase in the number of accommodation places and removal of aquaria tanks and the extraction of sea water from and the discharge of wastewater to Port Phillip Bay.

Of the 30 consultations mentioned by Urbis, seven were comprised of website content, 11 by electronic direct mail for those who had subscribed, four were market appearances, two were annual reports and only two were face-to-face consultations, one being a community briefing in May 2022 and one bespoke briefing for unspecified 'specific stakeholders' between June and December 2023.

The planning report, prepared in December 2024, failed to confirm whether those consultation referred to as To Be Confirmed in Appendix B were every carried out, which also included EDMs, some bespoke stakeholder briefings (one for the Friends of Point Nepean). Neither the Nepean Conservation Group nor VNPA and the National Trust were consulted. They should have been considered as 'key stakeholders.'

One participant in the most recent information webinar conducted by The Applicants on 27 March 2025 commented that 'it told the webinar attendees nothing new, the questions answered appeared to be "Dorothy Dixers" and no timeline was given for when questions from the registered attendees would be answered. Another PR exercise! Much of the research highlighted in the webinar could be conducted elsewhere, without being specifically located at Point Nepean National Park. How will it benefit understandings of Point Nepean National Park, Mornington Peninsula National Park, the Mornington Peninsula, the Heads and the Bellarine Peninsula?

28 February 2025

Heritage Victoria
heritage.permits@transport.vic.gov.au

Dear Heritage Victoria

Re: Application for Permit P35431 - P3543 Point Nepean Defence and Quarantine Precinct

Please accept this late submission by the Victorian National Parks Association (VNPA) with regards to the application by the University of Melbourne and Monash University for Permit P35431 - P3543 Point Nepean Defence and Quarantine Precinct as part of their National Centre for Coasts and Climate.

Thank you for the opportunity to do so, which became known to us following an extension request made by Ursula de Jong, President of the Nepean Conservation Group on 18 February 2025, the closing date for submissions. The response to her request was made on February 19 by Nicola Stairmand from the Department of Transport and Planning Transport Victoria, who indicated that late submissions could be received after that date under section 101(3)(b) of the *Heritage Act 2017* as 'any other relevant matter'.

The VNPA has maintained a very keen interest in the future of Point Nepean's natural and cultural heritage for more than 20 years. That interest began when we coordinated the statewide Save Point Nepean campaign (acknowledged in the Heritage Impact Statement associated with the permit application) for the area to be protected within an integrated national park. The campaign was supported by the National Trust and was driven locally by the Nepean Conservation Group.

The campaign succeeded in having the Commonwealth land returned to Victoria in 2009, followed by the establishment of the Point Nepean National Park. It was successful because of widespread community support for an outcome that would see the park used for the conservation of natural and cultural heritage, environmental research, education and interpretation, ecologically sustainable tourism and recreation and the effective and appropriate adaptive re-use of the many empty heritage buildings of Primary Significance in the Quarantine Station.

Throughout the campaign and since we have been confronted by various development proposals for the national park, and especially for the Quarantine Station. Most were poorly designed, inappropriate for the area, and lacked a business plan. This has also been true since 2007 for the many iterations of the National Centre for Coasts and Climate, the proposed field station of which is now the subject of the permit application P35431 - P3543 Point Nepean Defence and Quarantine Precinct.

The applicants are now seeking a permit to enable demolition, tree removal, construction, conservation and landscaping (including parking) for the proposed Research and Education Field Station. The works for the field station comprise the repurposing of Badcoe Hall, the construction of a two-storey accommodation building behind it, and the installation of associated services and hard and soft landscaping comprising paths, stairs, at-grade car parking, tree removal and new planting.

Our key concerns with the permit application now follow.

1. No community consultation

From the Heritage Impact Statement by Lovell and Chen we were informed that pre-application discussions between Heritage Victoria and the applicants began as far back as 2021, and that other planning process have also been in train. In that context we were surprised and disappointed that Heritage Victoria and the applicants have failed to consult with the community during these processes, especially with VNPA, the National Trust and the Nepean Conservation Group. Point Nepean National Park is too important for significant decisions such as these to be conducted behind closed doors.

This failure by Heritage Victoria and the applicants to engage with the key groups has been compounded most recently by the sticking of a notice about the permit application on the door of Badcoe Hall. This would appear to be the only source of community information and was only discovered by chance when the Nepean Conservation Group held its AGM at Badcoe Hall a couple of days prior to the closing date for submissions.

There have been no public meetings, community consultations or community conversations held by either Heritage Victoria or the applicants in relation to the permit application. Nor was the community made aware of the architectural drawings or reports accompanying the application (the documents relating to the permit application can no longer be found on the Heritage Victoria website).

This has hardly been a transparent and inclusive planning process.

2. Summary dismissal of adaptive re-use of heritage buildings of Primary Significance

The permit application is predicated on the repurposing of the Badcoe Hall, which from a heritage viewpoint is of Secondary Significance, and the construction of a new building behind it. This has led the applicants, as expressed in the Heritage Impact Statement, to summarily dismiss the adaptive re-use of heritage buildings with Primary Significance in the precinct.

We are pleased that Heritage Victoria at least asked why the applicants were not considering the adaptive re-use of the precinct's key heritage buildings. However, the response in the Heritage Impact Statement only briefly considered Hospital Buildings 3, 4 and 5, the Isolation Hospital Complex at the western end of the precinct, and the two Officer Cadet Accommodation buildings adjacent to Badcoe Hall. The Heritage Impact Statement would appear to have dismissed these options largely because they did not suit the applicants' plan for a brand-new building. However, the stated reasons of the Heritage Impact Statement can be summarised as follows:

A. Those buildings in the western end of the precinct are too far from Badcoe Hall, according to the Heritage Impact Statement. This is a very weak argument as the precinct's various heritage buildings of Primary Significance are easily accessible on

foot. And university students are well used to walking between buildings on their campuses.

B. The heritage buildings of Primary Significance, according to the Heritage Impact Statement, would cost too much to be adaptively re-used for what the Field Station requires or, in the case of one of the Officer Cadet buildings, is in too poor a condition (both officer cadet buildings, which are not of heritage significance, have been proposed for demolition in the past).

VNPA has never thought that the adaptive re-use of the heritage buildings at Point Nepean would be cheap. But these are important buildings of Primary Significance. Their adaptive re-use, designed in a way that conserves them, is critical for the long-term future of the precinct and the national park. The substantive government funding granted to the field station should be used for that purpose and the Government Architect should be engaged to advise on their adaptive re-use.

C. The Heritage Impact Statement also states that the heritage buildings of Primary Significance would not allow for the proposed accommodation configuration for the field station because it would remove their internal fabric. However, the configuration of accommodation is only supplied in a plan view of the proposed new building. There are no other details as to why that is the preferred configuration other than it would be to house 50 people.

VNPA believes that the focus of the planning and management of the Quarantine Station should be the adaptive re-use of the heritage buildings of Primary Significance, not the construction of new buildings. The applicants should be required to adjust the accommodation configuration of the field station to fit in within the internal conservation needs of the heritage buildings of Primary Significance.

D. We note that the research aims for the research station have been reduced and the proposed accommodation significantly increased. Badcoe Hall would be used for administration, classes, social spaces, kitchens, dining and laboratories, while the new building would be exclusively for accommodation. The applicants are happy to gut and destroy the internal fabric of the Badcoe Hall in a comprehensive repurposing (not adaptive re-use) but have used conservation of the internal fabric as an argument against the adaptive re-use of the heritage buildings of Primary Significance.

The repurposing of Badcoe Hall would appear to be giving convenient support for the applicants' contention that the accommodation needs to be close to Badcoe Hall rather than in other parts of the precinct. But if one or more heritage buildings of Primary Significance were adaptively re-used for the functions planned for Badcoe Hall, and others were used for accommodation, their argument for a new building fails.

E. Parks Victoria has other plans for one of the buildings and the isolation hospital complex, and the other Officer Cadet Accommodation building could be demolished, according to the Heritage Impact Statement. However, the statement provides no details on how serious and advanced the proposals are by Parks Victoria.

The Heritage Impact Statement made no mention of why the applicants did not consider Hospital Building 1 and 2 and the associated First-Class Dining building, as well as the nearby cottages and the Medical Superintendent's Quarters. The sensitively designed adaptive re-use of these buildings would form an excellent education and research precinct with easy access through Police Point.

3. Sole focus on built heritage in the footprint of the proposed field station and its immediate surrounds and ignores the broader national park

The permit application fails to consider the impacts that such a facility involving 24-hour access will have on the broader national park, especially nocturnal animals crossing the access roads. There is no information on how the field station's staff and students will access the site. Will it be through Police Point or the longer and circuitous Defence Road where nocturnal native animals will be at greater risk?

We acknowledge that the discussions between the universities and Heritage Victoria have led to a reduction in the scale of the field station. Thankfully the project no longer involves the construction of aquaria tanks and the extraction of sea water from and the discharge of wastewater to Port Phillip Bay, which is something we did not support. However, there is no mention in any of the documents associated with the permit application on whether the applicants will be seeking the construction of a new jetty to provide moorings for research vessels and other craft. VNPA has opposed such a proposal since it was first raised because it would significantly increase vessel traffic within a dolphin sanctuary. It is time for the jetty proposal to be scrapped by the Victorian Government.

4. Conclusion and recommendation

We believe that the permit application in its current form should be refused and for Heritage Victoria to insist that the applicants amend the proposal to focus on the adaptive re-use of the existing heritage buildings of Primary Significance. That should be accompanied by meaningful consultation and engagement conducted between Heritage Victoria, Parks Victoria, the applicants, the Point Nepean Advisory Group, VNPA, the National Trust and the Nepean Conservation Group (the submission of which we fully endorse). We also request a meeting with the Heritage Victoria staff overseeing the permit application.

The permit applicants have received \$17m of government funding and this should be used to provide the best outcome for the conservation of the Quarantine Station and the broader Point Nepean National Park. That outcome should not involve the construction of a new building. That would be a lost opportunity for the sustainable activation of the Quarantine Station and the Point Nepean National Park as a whole.

Yours faithfully



Matt Ruchel
Executive Director
Victorian National Parks Association.