

**Former Benalla Migrant Camp (Assessed by the Executive Director as the
'Former RAAF Base and Migrant Camp')**
1 & 57 Samaria Road, Benalla

Heritage Council Registrations Committee
Hearing – 10 & 11 February 2016
**Members – Mr Lindsay Merritt (Chair), Mr Patrick Doyle, Professor Andrew
May**

DECISION OF THE HERITAGE COUNCIL

Inclusion in the Register - After considering the Executive Director's recommendation, submissions received and conducting a hearing into those submissions, pursuant to Section 42(1)(b) of the *Heritage Act* 1995, the Heritage Council has determined that part of the Place is of cultural heritage significance and should be included in the Heritage Register.

Lindsay Merritt (Chair)
Patrick Doyle
Andrew May

Decision Date – 12 May 2016

APPEARANCES / SUBMISSIONS

Executive Director, Heritage Victoria

Submissions were received from the Executive Director, Heritage Victoria ('the Executive Director'). Ms Roslyn Coleman, Heritage Officer (Architectural History) appeared on behalf of the Executive Director. Dr Marina Larsson, Principal, Heritage Assessments, was also present and available to take questions.

Nominator

The nominator, Ms Sabine Smyth for Benalla Migrant Camp Inc., made oral submissions. Ms Smyth called on witnesses Ms Rosalie Dean and Ms Wendy Gray, and via video, witnesses Mr Paul Stevens, Ms Maria Fruehwirth, Mr Les Lesniewski, Mr Peter Fergin and Mr John Dryac.

Owner

The Owner, Benalla Rural City Council was represented by Ms Veronica Schilling. Ms Schilling called on expert witness Ms Deborah Kemp. Ms Kemp was available to take questions from other parties.

Other parties

Written and oral submissions were also received from the following parties:

Ms Judith Fleming
Mr Jim Klopsteins
Ms Helga Leunig
Mr Mark Carr on behalf of the Benalla Aviation Museum Inc.
Dr Bruce Pennay OAM
Ms Helen Topor
Ms Krystyna Topor
Mr Garry Cropley on behalf of Benalla Aeropark Club Inc (written only)

S38 WRITTEN SUBMISSIONS RECEIVED DURING ADVERTISING OF THE EXECUTIVE DIRECTOR'S RECOMMENDATION

Pursuant to s38 of the Heritage Act 1995 (the Act), written submissions were received during the public notice period of the Executive Director's recommendation.

The following s38 submissions objected to the Executive Director's recommendation.

Ms Margaret Aldous (Coinda Village)	Ms Stephanie Merry
Mr Mark Carr (Benalla Aviation Museum Inc.)	Mr Alan Monger (Benalla Historical Society Inc. and Costume and Kelly Museum)
Ms Velta Fellowes	Dr Bruce Pennay OAM
Ms Judith Fleming	Ms Stephanie Ryan MP (with attached petition)

Mr John Joyce (North East Multicultural Ass. Inc.)	Benalla Rural City Council (per Ms Veronica Schilling)
Mr Adam Klopsteins	Ms Sabine Smyth (Benalla Migrant Camp Inc)
Mr Jim Klopsteins	Mr Paul Stevens
Ms Monica Kozlovskis	Ms Helen Topor
Ms Helga Leunig (Helga Leunig Photography)	Ms Sophia Turkiewicz

Introduction

The Place

- 1 The nominated area ('the Place'), being part of the former Benalla Migrant Camp, is located on land which previously formed part of the World War II Royal Australian Air Force (RAAF) Base at 1 & 57 Samaria Road, Benalla. The nominated land contains nine P1-type huts, two toilet blocks, concrete gate posts at the intersection of Barc Avenue with Samaria Road, a remnant below-ground cistern, Barc Avenue itself together with kerb and channel, several unused electricity reticulation poles, and concrete surface drainage channels beside most of the huts. The huts were constructed using a standard P1-type design with timber frames, gabled ends, horizontal corrugated iron wall cladding, and corrugated iron or asbestos cement roof cladding. Five out of the eleven buildings have apparently been moved within the former RAAF base and varying degrees of maintenance, modifications and minor additions have occurred to those eleven buildings over time.

Nominations

- 2 On 7 March 2015, the Executive Director accepted a nomination from local resident Ms Sabine Smyth, on behalf of Benalla Migrant Camp Inc., for the Place to be included in the Victorian Heritage Register ('VHR').

Recommendation of the Executive Director

- 3 On 10 July 2015, the Executive Director recommended that the Place not be included in the VHR and that it be referred to Benalla Rural City Council for inclusion in the Heritage Overlay of the Benalla Planning Scheme.
- 4 18 submissions objecting to this recommendation and 1 supporting were received by the Heritage Council and, in accordance with s.40(2) of the Act, a hearing was required.

Preliminary Matters

- 5 Ms Helga Leunig and Ms Krystyna Topor lodged late hearing submissions, prior to the commencement of the hearing. Parties were provided the opportunity to comment on the inclusion of this material at the beginning of the hearing. No objections were received and the Committee determined to include Ms Leunig and Ms Topor's submissions for consideration.
- 6 At the start of the hearing Dr Bruce Pennay requested that the Committee allow him to introduce a newly reorganised version of his previously submitted material, and Ms Judith Fleming requested to provide copies of her argument in an updated written format. The Committee adjourned to consider these matters and determined that this additional written material would not be accepted.

Site Inspection

- 7 The Committee made an inspection of the site on 9 February 2016, accompanied by an officer of Benalla Rural City Council. No submissions were received at this time.

ISSUES

- 8 This section is not intended to be a complete record of submissions that were made to the Committee. It is a summary of what the Committee considers to be the key issues, followed by an explanation of the position the Committee takes on each issue.
- 9 Any reference to Criteria refers to the ‘Heritage Council Criteria for Assessment of Places of Cultural Heritage Significance’ (see Attachment 1 to this report).

Summary of issues

- 10 The Executive Director recommended that the Place not be included in the VHR as it does not satisfy any of the criteria at a State level.
- 11 The nominator and other objecting parties submitted that the Place, being part of the former Benalla Migrant Camp, is of historic and social significance to the State of Victoria and that it satisfies criteria A, B, C and G. One submission also made a case that criterion H could be satisfied.
- 12 Very little evidence was put forward as to the heritage significance of the Place as part of a former RAAF Base and as such, the Committee will focus on the importance of the site as a former migrant camp (‘the Camp’).

Criterion A - Importance to the course, or pattern of Victoria’s cultural history

- 13 There was agreement between the various submitters that the Place is associated with post-World War II migration and that this is an important phase in Victoria’s cultural history. Many (but not all) of the Camp’s residents originated in northern Europe, reflecting the Australian Government’s preferences in terms of assisted migration at that time.
- 14 The objecting parties disagreed with the Executive Director on the significance of the Place’s association with that phase.
- 15 The objecting parties also disagreed with the Executive Director on the integrity of the site and its fabric, and in particular how physical changes to the site are likely to impact on the Place’s ability to demonstrate its association with the relevant phase in Victoria’s history.

Submissions and evidence

- 16 The Executive Director submitted that the association of the Place with both World War II and post-war migration is well documented and that post-World War II migration is of great importance to the course of Victoria’s cultural history. However, it is his view that other more intact sites, namely Block 19 at the former Bonegilla Migrant Camp and the former

Maribyrnong Migrant Hostel, more clearly demonstrate the associations with post-war migration than the Place and are already included in the VHR.

- 17 A number of objecting submitters contended that the Camp served a different purpose to the comparison sites used by the Executive Director and that State level significance can be established by reference to the particular nature of the Place as a holding centre. It was argued that, as a result of the holding centre function, the Place retains associations with post-war migration that are different to, and in some ways stronger than, those of other comparable sites.
- 18 In response the Executive Director stated that the ‘phase’ in discussion is post-war migration in Victoria and the sites discussed in his recommendation had similar roles to the Place, in that they provided accommodation for non-British migrants.
- 19 Ms Fleming submitted that immigration is a key theme for understanding the ways that Australia has changed as outlined in the Victorian Framework of Historical Themes (2010). Ms Fleming submitted that the Place enables the phase of post-World War II migration to be understood better than most other places in Victoria. Ms Fleming submitted that the Executive Director had misapplied Criterion A, in that the relevant inquiry conducted on his behalf had been whether the Place enabled this historical phase to be better understood than *all* other places in this regard (rather than *most* other places).
- 20 Ms Fleming provided a considerable volume of archival material which shed considerable light on the administration and functioning of the Camp. This included some revealing reports from social workers who were responsible for assessing and monitoring the Camp’s functioning from the perspective of residents.
- 21 Both Ms Fleming and Dr Pennay submitted that, aside from Bonegilla (which is already recorded on the VHR) and Benalla, there are no remnants of any other migrant camp in Victoria. These assertions were relied upon to argue that the Place allows a better understanding of post-World War II migration than most other places in Victoria.
- 22 In her evidence Ms Kemp submitted that there is a strong connection between the camps at Bonegilla and Benalla. In comparing the two sites, there are similarities in terms of the remnant fabric (ie the utilitarian huts) and the sense of place, however the functions of the two camps differed.
- 23 Dr Pennay submitted that immigration made a strong and substantial impact in Victoria and that the Place is one of only two substantial remnants in Victoria of a former network of 23 camps which had been established and used throughout Australia to accommodate assisted non-British migrants post-World War II. Dr Pennay submitted that, aside from Bonegilla and Benalla in Victoria, remains of only one other such migrant camp remain

within the whole of Australia (namely at Scheyville in New South Wales, a place which he indicated is protected under that State's heritage legislation).

- 24 In response to Dr Pennay's submission Dr Larsson, on behalf of the Executive Director, noted that when looking at a significant historical 'pattern or system', it is not necessarily appropriate to include on the VHR all the places which were constituent parts of that system; rather some components of the system may be of State significance whereas others may not.
- 25 It was argued by a number of parties that the Place allows a better understanding of Australian government policies such as migrant factory labour, assimilation and decentralisation. The Renold Chain Company's factory and the Latoof and Callil clothing factory were both built in close proximity to the Camp to allow specific access to the migrant labour pool.
- 26 The majority of the objecting submitters argued that the Place is significant due to its use as a centre for unsupported women and their children, and that it is a very early example of a place where childcare was provided for working mothers. It was argued that these specific values are not currently represented in the VHR.

Integrity

- 27 Arguments in relation to the integrity of the Place, and the ability of the remaining fabric to demonstrate the relevant values, were recurrent throughout the submissions and evidence.
- 28 The Executive Director submitted that the site has been compromised by the removal or relocation of large numbers of buildings as well as additions and modifications to the remaining structures. He argued that it is now difficult to understand the original design of the Camp, given that the area where remnant fabric remains only comprises a small portion of the original holding centre. He further argued that the poor integrity of the Place means that only a limited understanding of the migrant camp facility is demonstrated in the surviving fabric.
- 29 In response to the Executive Director, many submitters argued that the recommendation was too focused on fabric. Dr Pennay emphasised that part of the importance of the nominated Place is its location, illustrating the context of camps being on the edge of country towns (therefore geographically and socially isolated).
- 30 Dr Pennay acknowledged that heritage places are unlikely to 'tell a story' if they feature no relevant historic fabric. He expressed the view, however, that there is sufficient identifiable fabric to enable an understanding of the significance of the Place. Dr Pennay compared the approximate proportion of existing fabric at Benalla and Bonegilla and concluded that, although Bonegilla was larger, there is currently only 2.8% extant fabric at that site, whereas Benalla has 7.5% remaining.

- 31 This view was supported by other submitters including Ms Krystyna Topor who argued that there is still representative fabric at the Place which reflects the deep and enduring association with the community. Mr Jim Klopsteins argued that the remaining buildings at Benalla ‘anchor the stories’ of former residents, many of whom use the Place to assist them in reflecting on their personal and family histories. Many of the former residents acknowledged the relatively poor state of the buildings within the Place but emphasised that the remaining structures allow interpretation of the Place as a sanctuary where migrants transitioned out of traumatic pasts and into becoming Australian. Furthermore, many former residents and their descendants asserted the significance of the Place as a site of remembrance, mourning, healing and reflection, where complex intergenerational experiences of both trauma and pride are negotiated in the present.
- 32 Ms Kemp gave evidence that fabric is integral to most places of cultural heritage. She expressed the view that the fabric of the Place gives a sense of the values which have been identified. She concurred with Dr Pennay that, in addition to the remnant fabric, the setting is also significant (beside an airfield, on the outskirts of a country town), since its locational attributes continue to convey a sense of the isolation and transience that residents experienced, as well as demonstrating government policy in relation to the preferred location of migrant camps.

Discussion and Conclusion

- 33 The Committee agrees with the parties that post-World War II non-British migration was a phase of great significance to the course and pattern of Victoria’s history, and that the association of the Place to this phase is evident in the physical fabric of the Place and through the oral histories and documentary resources.
- 34 It is the Committee’s view that the Place allows the association with post-World War II non-British migration, and more specifically the reality and rhetoric of the Australian Government’s response to accommodating those migrants, to be understood better than most other places in Victoria with the same association.
- 35 The Committee acknowledges that other places in Victoria also have important associations with this historic phase, including other places which were used to accommodate migrants (such as Bonegilla and Maribyrnong).
- 36 The Committee accepts the arguments put by Dr Pennay and other objecting submitters that the Place served a purpose which significantly differed from that of either Bonegilla or Maribyrnong. Maribyrnong was a workers’ hostel, controlled by the Department of Labour and National Service. Although it accommodated migrants soon after their arrival, it was not part of the network of 23 migrant camps established by the Department of Immigration. Bonegilla was part of that network of 23 camps, but it mainly functioned as a reception centre, where people typically passed through within a period of weeks or months. On the other hand, Benalla functioned

as a holding centre. As such it provided long-term housing to recent migrants (many of whom had initially passed through Bonegilla), and enabled them to establish new lives in Australia (including via access to employment and education).

- 37 The Committee has concluded that the Camp is a place of historical importance as an example of one of only a small number of surviving centres which had been part of a network of camps that were established and used to accommodate migrants throughout Victoria and Australia.
- 38 The Camp was Victoria's longest-lasting holding centre. It played a distinctive role in settling vulnerable groups of non-British migrants into Australia in the post-war years, particularly displaced persons from northern Europe, being the nationalities that the Australian government had initially favoured for the purpose of assisted post-war migration.
- 39 The Place should be seen as complementary to the Bonegilla Migrant Training and Reception Centre with both sites demonstrating better than most, the network of camps used to process and house post-World War II non-British migrants.
- 40 While there has been considerable loss of integrity over time due to the loss of many huts, and modifications to the fabric or relocation of surviving huts, the Committee is of the view that enough of the historic fabric remains, in association with other historical information, to demonstrate the historical significance of the Place. The Place is readily identifiable in terms of demonstrating key aspects of the Camp by way of its isolated siting, its layout, and the survival of individual buildings that had been used for accommodation and other purposes. Having inspected the Place, the Committee is satisfied that the remaining huts and toilet blocks enable visitors to gain a level of understanding of the day-to-day realities of former residents. This level of understanding can be enhanced by the existing museum, and potentially in future by other aids to interpretation. The remaining fabric has the ability to facilitate an understanding of the experiences of post-war non-British migrants as they initially settled into the Victorian community.
- 41 A number of submitters argued that the Place is significant for its association with the decentralisation of Victorian manufacturing by providing labour to the Renold Chain Company factory and the Latoof and Callil clothing factory. The Committee accepts that the Government's policy of decentralisation may be a phase of importance to Victoria's history, but the Committee was not provided with enough material to make this determination, nor was the Committee convinced by the evidence before it that the Place demonstrates this phase better than most other places. Decentralisation impacted on a number of Victorian towns and a comparative analysis would need to be undertaken before determining whether the Place demonstrates an association with this period better than most.

Criterion B – Possession of uncommon, rare or endangered aspects of Victoria’s cultural history

- 42 The parties disagreed on whether the Place satisfied Criterion B.

Submissions and evidence

- 43 The Executive Director noted that the Place is ‘one of a small number of sites in Victoria that remain to illustrate the phase of post-war immigration’, but submitted that this ‘phase’ is more clearly demonstrated at other sites. The Executive Director primarily assessed the rarity of the Place by reference to the P1-type huts, and noted that there are a large number of these in Victoria, many of which are already included in the VHR.
- 44 A number of objecting submitters argued that the Place is rare as an example of a holding centre, specifically for unsupported women, as opposed to a reception centre.
- 45 In response to the objecting submitters, the Executive Director stated that the argument presented in paragraph 44 is dependent on too many qualifiers. The Executive Director also submitted that ‘uniqueness in itself does not make a place of State significance’ and that the VHR does not need to include a representative of every group of buildings or sites. Further, the Executive Director noted that no comparative examples have been provided to illustrate the distinction between holding centres for unsupported women and others within Victoria.
- 46 Ms Fleming submitted that there is a gap in the recognition of post-World War II migration in the VHR, but as Ms Fleming noted this is not, in itself, a reason to include the Place in the VHR. The site must demonstrate State level significance to be included in the VHR.

Discussion and Conclusion

- 47 As outlined under Criterion A, the Committee has determined that the Place has a clear association with the accommodation of post-World War II non-British migrants, and that this is a phase of importance in Victoria’s cultural history. The association of the Place to this phase is evident in the fabric and documentary resources.
- 48 It is the Committee’s view that the Place is uncommon as it is one of only a small number of places remaining in Victoria which demonstrate this phase of the State’s history.
- 49 There was little presented to the Committee in relation to the current state of the other former holding centres in Victoria (Mildura, Rushworth, West Sale and Somers). Dr Pennay’s submission, that no physical fabric remains at those four sites, was uncontested by others. Even if some historic fabric were to survive at one or more of those four sites, the Committee would still be satisfied that the Place is sufficiently rare or uncommon within Victoria, sufficient to meet Criterion B.

- 50 The Committee accepts the Executive Director’s argument that any site could be considered significant or rare if it is defined by reference to enough qualifiers. One of the qualifiers included that it had a special role in the accommodation of unsupported women and their children.
- 51 The Committee is not persuaded, however, that the significance of the Place is dependent on any excessive degree of qualification. To quote Dr Pennay:
- This is not a finicky distinction based on numerous qualifiers. Benalla Migrant Camp is one of only two substantial remnants of a network of places used to accommodate assisted non-British new arrivals in the post-war years.
- 52 The Committee considers that the particular details of the Place’s history are important and likely to be of ongoing interest. However, for the purpose of Criterion B, it is not necessary to characterise the relevant ‘aspects of Victoria’s cultural history’ by reference to these more fine-grained details.
- 53 The Committee finds that Criterion B is satisfied and that the Place is of significance to Victoria as a rare example of a post-World War II holding centre for non-British migrants.

Criterion C – Potential to yield information that will contribute to an understanding of Victoria’s cultural history

- 54 The objecting submitters disagreed with the Executive Director on whether the Place satisfied Criterion C.

Submissions and evidence

- 55 The Executive Director submitted that there is the potential that historical archaeological deposits may be found at the site, and that upon further investigation these deposits may contain information about the use and history of the Place. However, it was argued that it is unlikely that this information will meaningfully contribute to an understanding of Victoria’s cultural history beyond what is already known from other sources and therefore Criterion C is not likely to be satisfied.
- 56 Ms Smyth submitted that the documentary evidence and oral history has high integrity and could be used to gather further information.

Discussion and Conclusion

- 57 The Committee is of the view that, while it is likely that historical archaeological deposits remain on the site, it is unlikely that an investigation of these deposits would yield such a great deal of further information as to meet the threshold of Criterion C. Many of the submitters have commented on the range and quantity of oral, historical, and documentary evidence available relating to the Place. In light of the availability of this material, it is unlikely that any archaeological investigations would contribute such a greater understanding as to justify inclusion on the VHR under this criterion.

58 The Committee finds that Criterion C is not satisfied.

Criterion G – Strong or special association with a particular community or cultural group for social, cultural or spiritual reasons. This includes the significance of a place to indigenous people as part of their continuing and developing cultural traditions.

59 The parties disagreed on whether the Place satisfied Criterion G.

Submissions and evidence

- 60 In his recommendation the Executive Director stated that ‘Benalla has some social significance for its association with migrants accommodated at the camp and their descendants’, although in his assessment there was not enough evidence to indicate that this was a strong or special relationship. On this basis he argued that Criterion G is not likely to be satisfied.
- 61 The Executive Director acknowledged that the Place is of significance for former residents and their families and that at present, casual visitation and association may strengthen over time. He argued, however, that at the time of his recommendation this could not be assumed.
- 62 The majority of arguments presented by objecting submitters focused on demonstrating that the Place was of social significance to the State of Victoria for its association with a particular community group. Ms Smyth submitted that the time and effort put into presentations to the hearing by former residents and their family and friends clearly demonstrates the strong and special association such community group have with the Place. Ms Smyth acknowledged that this association may not have been as visible in the past due to a number of factors. She argued, however, that an ongoing connection with the Place has recently begun to be demonstrated in more public ways, in particular through visitation to the museum and engagement through social media. Further, it is her view that the Place has the ability to communicate to the broader Victorian community about this significant aspect of Victoria’s history.
- 63 In her submissions Ms Fleming argued that in assessing social significance the Executive Director failed to examine different types of evidence for a strong or special association and focused on physical use of the Place rather than engagement with the Place. Ms Fleming submitted that there is clear evidence of a strong and enduring engagement between the particular community group and the Place. It is her view that use of the Place was restricted due to issues of assimilation policy, site ownership and access, as well as access to records. She submitted, however, that residents have maintained a strong and special association with the Place through long-term engagement. The elevation of this Place from one of importance to the local community is its embodiment of themes of State level significance.
- 64 Many former residents argued that assimilationist policy and their parents’ desire to ‘fit in’ meant that their parents’ generation was often unwilling to identify publicly with the Place, however strong their shared private

attachment. Anglicisation of surnames and an imperative to blend in mitigated against many former residents and their families feeling empowered to claim their heritage. As the generation of children have grown up, they are embracing their past and want to share that story with the broader community.

- 65 Mr Jim Klopsteins highlighted that the fabric of the Place is significant as an ‘anchor’ for the stories of this phase of history. Mr Jim Klopsteins argued that, like others, he has had an enduring relationship with the Camp but that this hasn’t been highly visible, for reasons that he and others explained.
- 66 Many of the submitters were children during their time as residents at the camp and made particular note of the experiences and hardships of their parents, often in distinction to their own sense of safety and community that they felt, as children, during their time at the Camp. Others recognised the importance of experiencing history where it took place.
- 67 Ms Kemp submitted that there is a clearly defined community group related to the Place and that they can demonstrate their direct association.

Discussion and Conclusion

- 68 The Committee acknowledges that this Place holds very special memories for the former residents. Of course, it could be argued that every childhood home is significant for its former residents, and this kind of connection alone cannot be sufficient to meet the threshold of State level heritage significance. The Committee considers that determination of State significance under Criterion G depends on the Place’s ability to convey some understanding of the experiences of former residents to the broader Victorian community.
- 69 The Committee is of the view that the former residents and their descendants form a ‘community or cultural group’ who share a common identity and that there is a direct, strong and special association between this group and the Place. The Committee is satisfied by the evidence provided that this association is demonstrated by the long-term engagement with the Place by the aforementioned group.
- 70 The Place represents a particularly strong example of the association between it and the community group by reason of its ability to interpret the experiences of post-World War II non-British migrants to the broader Victorian community. The strength of this association was particularly demonstrated by way of numerous moving personal stories, both written and oral, of living and growing up at Benalla Migrant Camp. Associations with the Place contribute to the identity of many people who have personal or family connections to the Place.
- 71 In terms of State significance, the Committee is satisfied that the social significance of the Place will be of interest to the Victorian community more broadly. As argued by Dr Pennay, Ms Fleming and others, the theme of immigration is central to Victoria’s history and its identity. It would be

difficult to argue otherwise. The Committee considers that the story of Benalla will be of interest to a wider Victorian audience, including people of northern European heritage, those with a personal or familial memories of migration experiences from different eras, particularly from origins other than Britain and Ireland, those with an interest in public policies such as multiculturalism and assimilationism, as well as more general audiences.

- 72 The Committee has determined that the Former Benalla Migrant Camp is of social significance at the State level, and so Criterion G is satisfied.
- 73 The Committee notes that long-term engagement has taken different forms over time and has included (but is not limited to): documented experiences of camp residents and their visits to the Place; oral history of camp residents and direct connections with family members and the wider community; photographic records of the surviving buildings; research of relevant archival material; long-term connections between former residents; and the beneficial healing value felt by camp residents and their families when they visit the Place.
- 74 The Committee accepts the submissions that a lack of formal or regular commemoration or celebration does not indicate the lack of a sufficient connection between the relevant community group and the Place. In reaching this conclusion, the Committee recognises the factors that mitigated against these kinds of public displays, not least the complexity of emotions – shame as well as pride – aroused by memories of the migration experience (‘a difficult heritage’, to adopt Dr Pennay’s phrase).
- 75 Further, the Committee notes that Criterion G itself does not necessarily require demonstration of ‘ceremonial, ritual, commemorative, spiritual or celebratory use of the place’. This language derives from the associated ‘Threshold Guidelines’ which are published by the Heritage Council. Those guidelines are designed to operate as a tool to assist people’s understanding of the Criteria themselves, but they do not operate to modify or limit the Criteria.
- 76 A recurring theme in the submissions was the perceived failure by the Executive Director to assess different forms of information, particularly in relation to social significance of the Place. The Committee recognises that social significance can be displayed in a number of ways but would like to note that when this significance is at a private, or familial, level it is difficult for organisations such as Heritage Victoria to be able to quantify and assess. The Heritage Council hearing process enabled the community to express its connection to the Place in a way that may have perhaps been difficult for the Executive Director to appreciate at the earlier stages of assessment.

Criterion H – Special association with the life or works of a person, or group of persons, of importance in Victoria’s history.

- 77 Ms Judith Fleming’s submission included an argument that the Place satisfied Criterion H on the basis that it ‘has a direct association with a

group of people, post WWII European Migrant Women and their children who have made a strong and influential contribution to the course of Victoria's history.

- 78 The Committee was not persuaded that the Place satisfies this criterion.

OTHER MATTERS

- 79 While not detailed in this document the Committee would like to thank the former residents for sharing their stories in person or on video. The Committee recognises the difficult nature of some of these memories and appreciates the time and effort spent preparing presentations.
- 80 Many submitters detailed the collections of objects and photographs associated with the site and the on-site interpretation in the form of the Migrant Museum. The Committee acknowledges the importance of these collections to the community and would like to acknowledge the time and effort which has gone into collating and displaying this material. Under the applicable legislation, however, the Committee is unable to consider these collections as part of the registration and must restrict its decision to an assessment of the land and built fabric.
- 81 A number of arguments were presented to the Heritage Council regarding the inclusion of the Place within the local Heritage Overlay. Whether or not the site meets the threshold for inclusion in the Heritage Overlay of the Benalla Rural City Planning Scheme was not the question before this Committee for determination. It is the Benalla Rural City Council's responsibility to recognise and protect sites of local cultural heritage significance.
- 82 As noted at the outset, the Heritage Council's determination of cultural heritage significance only relates to part of the area that was the subject of the relevant nomination. The area of land to which the Committee's findings relate is delineated in Attachment 4 to this document. The area identified as 'B' in the nomination is to be included in its entirety (being the location of the remaining huts). However the area to be included on the VHR excludes much of the area identified as 'A' in the nomination (being the area located to the north of Barc Avenue and the west of Fifth Avenue). The extent of registration includes Barc Avenue itself, the gateposts at the intersection with Samaria Road, as well as a splay which is designed to encompass the cistern and maintain its connection with Barc Avenue. No submissions or evidence satisfied the Committee of any basis to include any of the balance of area 'A'.

CONCLUSION

- 83 The Committee finds that the Former Benalla Migrant Camp, being part of the nominated place, is of historical and social significance to the State of Victoria and meets the threshold for inclusion in the Victorian Heritage Register under Criteria A, B and G.

- 84 The Statement of Significance, Extent of Registration and Permit Policy/Permit Exemptions are detailed in Attachments 2, 3 and 4.
- 85 The Committee determines, in accordance with s42(1)(b) and (c) that the remainder of the Place is not of cultural heritage significance to the State of Victoria and so does not warrant inclusion in the Register.

ATTACHMENT 1

HERITAGE COUNCIL CRITERIA FOR ASSESSMENT OF PLACES OF CULTURAL HERITAGE SIGNIFICANCE

CRITERION A	Importance to the course, or pattern, of Victoria's cultural history
CRITERION B	Possession of uncommon, rare or endangered aspects of Victoria's cultural history.
CRITERION C	Potential to yield information that will contribute to an understanding of Victoria's cultural history.
CRITERION D	Importance in demonstrating the principal characteristics of a class of cultural places or environments.
CRITERION E	Importance in exhibiting particular aesthetic characteristics.
CRITERION F	Importance in demonstrating a high degree of creative or technical achievement at a particular period.
CRITERION G	Strong or special association with a particular community or cultural group for social, cultural or spiritual reasons. This includes the significance of a place to Indigenous peoples as part of their continuing and developing cultural traditions.
CRITERION H	Special association with the life or works of a person, or group of persons, of importance in Victoria's history.

These were adopted by the Heritage Council at its meeting on 7 August 2008, and replace the previous criteria adopted by the Heritage Council on 6 March 1997.

ATTACHMENT 2

Statement of Significance

What is significant?

The Former Benalla Migrant Camp including associated buildings and a range of on-ground and below-ground infrastructure.

History Summary

The Benalla Migrant Camp was established in September 1949 on land previously used by the Royal Australian Air Force (RAAF) as an Elementary Flying Training School (1941-1944), making use of the accommodation and facilities which remained. The camp was part of a bold immigration programme launched to increase the population, and hence the labour force, of Australia. Reception and training centres were established to provide accommodation and training and between 1945 and 1965 more than two million migrants came to Australia as a result of an international promotional campaign. The largest Australian migrant reception centre was the Bonegilla Migrant Centre which was the first camp to be used for this purpose when opened in 1947. Victorian holding centres were established at country locations at Benalla, Mildura, Rushworth, Sale West and Somers. The Benalla Migrant Camp operated as a holding centre and provided accommodation as well as a kindergarten, school, hall, hospital, shops and a gymnasium and primarily housed unsupported women who had limited access to jobs. A number of migrants stayed longer than those at other camps. Some residents worked at the centre itself, in administration, the kitchen or hospital, or as cleaners, while others found domestic work in Benalla itself or worked at the nearby Latoof and Callil clothing factory and Renold Chain Company factory. By 1958 Benalla (renamed the Benalla Migrant Accommodation Centre) and Bonegilla were two of only six government operated centres remaining in Australia. During its 18 years of operation an estimated 60,000 migrants were accommodated. After its closure in 1967 the airfield continued to be used for civil aviation purposes, principally for recreational gliding and ballooning. Many structures were demolished in the 1980s before the former City of Benalla acquired ownership of both the airfield and the remaining structures in 1992.

Description Summary

The Former Benalla Migrant Camp is located on land which previously formed part of the World War II RAAF Base at 1 & 57 Samaria Rd, Benalla. The land contains nine P1-type huts, two toilet blocks, concrete gate posts at the intersection of Barc Avenue with Samaria Road, a remnant below-ground cistern, Barc Avenue itself together with kerb and channel and several unused electricity reticulation poles, and concrete surface drainage channels beside most of the huts. The huts were constructed using a standard P1-type design with timber frames, gabled ends, horizontal corrugated iron wall cladding, and corrugated iron or asbestos cement roof cladding. Five out of the eleven buildings have apparently been moved within the former RAAF base and varying degrees of maintenance, modifications and minor additions have occurred to those eleven buildings over time.

This site is part of the traditional land of the Yorta Yorta Nations.

How is it significant?

The Former Benalla Migrant Camp is of historical and social significance to the State of Victoria. It satisfies the following criterion for inclusion in the Victorian Heritage Register:

Criterion A

Importance to the course, or pattern, of Victoria's cultural history.

Criterion B

Possession of uncommon, rare or endangered aspects of Victoria's cultural history.

Criterion G

Strong or special association with a particular community or cultural group for social, cultural or spiritual reasons. This includes the significance of a place to Indigenous peoples as part of their continuing and developing cultural traditions.

Why is it significant?

The Former Benalla Migrant Camp is significant at the State level for the following reasons:

The Former Benalla Migrant Camp is of historical significance for its association with post-World War II non-British migration. It is an example of one of only a small number of surviving centres which had been part of a network of camps that were established and used to accommodate migrants throughout Victoria and Australia. Benalla was Victoria's longest-lasting holding centre and played a distinctive role in settling vulnerable groups of non-British migrants into Australia in the post-war years.

The Former Benalla Migrant Camp is rare as one of only a small number of examples of a post-World War II holding centre for non-British migrants.

The Former Benalla Migrant Camp is of social significance for its connection with former residents and their families and for its ability to interpret the experiences of post-World War II non-British migrants to the broader Victorian community.

ATTACHMENT 3

PERMIT POLICY

Future conservation and management of the Former Benalla Migrant Camp should retain the structure and form of the huts. Details such as number plates attached to the huts and remnants of the original internal layout are important parts of the fabric and care should be given when considering works which may impact on these features.

Management of the surrounding landscape should seek to retain the kerbing and drainage associated with the huts, the entrance gates at the intersection of Barc Avenue with Samaria Road together with the kerbing, pavement and disused electricity reticulation poles along Barc Avenue.

PERMIT EXEMPTIONS

The purpose of permit exemptions is to allow works that do not impact on the heritage significance of the place to occur without the need for a permit. Works which impact on the significance of the place are subject to permit applications.

General Conditions: 1. All exempted works are to be planned and carried out in a manner which prevents damage to the fabric of the registered place or object.

General Conditions: 2. Should it become apparent during further inspection or the carrying out of works that original or previously hidden or inaccessible details of the place or object are revealed which relate to the significance of the place or object, then the exemption covering such alterations shall cease and the Executive Director shall be notified.

Note: All heritage places have the potential to contain significant sub-surface artefacts and other remains. In most cases it will be necessary to obtain approval from Heritage Victoria before the undertaking any works that have a significant sub-surface component.

General Conditions: 3. If there is a conservation policy and plan approved by the Executive Director, all works shall be in accordance with it.

Note: The existence of a Conservation Management Plan or a Heritage Action Plan provides guidance for the management of the heritage values associated with the site. It may not be necessary to obtain a heritage permit for certain works specified in the management plan.

Minor Works

Note: Any Minor Works that in the opinion of the Executive Director will not adversely affect the heritage significance of the place may be exempt from the permit requirements of the Heritage Act 1995. A person proposing to undertake minor works may submit a proposal to the Executive Director. If the Executive Director is satisfied that the proposed works will not adversely affect the heritage values of the site, the applicant may not be required to obtain a heritage permit.

Landscape

- * The process of gardening, hedge clipping, removal of dead plants, emergency and safety works and landscaping in accordance with the original concept.
- * The replanting of plant species to conserve the landscape character.
- * Plant labelling and interpretive signage.
- * Management of trees in accordance with Australian Standard, Pruning of Amenity Trees AS 4373
- * Removal of plants listed as State Prohibited and Regionally Controlled Weeds in the Catchment and Land Protection Act 1994
- * Repairs, conservation and maintenance to hard landscape elements, gravel paths and roadway, edging, fences and gates and gravel driveway.

ATTACHMENT 4

EXTENT OF REGISTRATION

All of the place shown hatched on Diagram 2358 and encompassing part of Lot 2 on Plan of Subdivision 509898, part of Lot 1 on Plan of Subdivision 347898 and part of the road reserve for Samaria Road.



