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HERITAGE IMPACT STATEMENT

Place:	Directing & Ranging Station Point Lonsdale Lighthouse Reserve VHR no. H1517 & HO84
For:	The Borough of Queenscliffe
Date:	6 August 2026, updated 17 September 2026

Introduction

On behalf of the Borough of Queenscliffe, this Heritage Impact Statement (HIS) addresses the heritage impact of the proposed reconstruction works of the roof slabs and support of the former Ranging Station that is one of the defence structures in the Point Lonsdale Lighthouse Reserve. Also addressed is the proposal to construct a steel stair and steel balustrade to the upper level of the Ranging Station for its use one again as a lookout as shown in the C1960s photograph. The proposed works are documented on the drawings by Quatrefoil Consulting Pty Ltd, 7901-Building 2-Issue B, (lookout) 26 March 2026.



Figure 1 1961 Photo of the Direction & Ranging Station then in use as a lookout

This report is informed by the community *Submission to the Australian Heritage Council* from November 2017 which provides a more complete history of the place than is included in the citations available on the Victoria Heritage Database. This Heritage Impact Statement is based on the previous HIS from 16 March 2025 addressing the Point Lonsdale Lighthouse Reserve – Defence Structures.

That earlier HIS addressed the five defence structures operational during the First and Second World Wars and constructed in reinforced concrete, and, the Victorian era brick Rocket Shed used for storage of rockets and delivery of rescue lines to vessels that might founder at the Point. Along with the subject Directing and Ranging Station building the other buildings include:

1. Eastern Gun Emplacement.
2. Western Searchlight Emplacement.
3. Eastern Searchlight Emplacement
4. Infrared Emplacement
5. Rocket Shed

The purpose-built former defence structures are related in design, construction, and deteriorating condition to those across the heads at Point Nepean, and to other Second World War coastal defence structures, such as those at Townsville. The structures are identified as follows:

> *Two searchlight emplacements, an electric light directing station and engine house were constructed in 1914. Further defence structures were erected in response to the commencement of WW2. A new concrete emplacement, now the engine shed, was constructed in 1941 and two gun emplacements and a fire directing emplacement were added in 1942.* [1]

It is noted that the concrete roofs to the searchlight structures were constructed in 1937.[2]

As described by David Hogg, the defence structures are "almost fully constructed of reinforced concrete in either 1914 or 1942. Roofs over internal spaces are flat and constructed with shallow falls to the side or to point drainage outlets. Floors are often obscured or buried but are also understood to be concrete in all cases... (The) *major issue with all of the concrete structures is long-term deterioration and spalling of the concrete structure due to corrosion and consequential expansion of embedded reinforcement.*"[3]

The defence structures are assumed to have been decommissioned after the Second World War and given no connected services these structures have had no utility since the cessation of hostilities. It

[1] National Heritage, Point Lonsdale Lighthouse Reserve, Submission to the Australian Heritage Council, November 2017, Statement of Significance, Page 8

[2] Commonwealth of Australia Gazette11 February 1937 No.6, page 274

[3] Structural Assessment of Selected Former Observation, Searchlight and Gun Emplacements at Point Lonsdale Lighthouse Reserve, Quatrefoil Consulting Pty Ltd, page 4&5

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remains unlikely that the defunct defence structures are suited to any obvious new occupation other than the proposed reactivation of the former Directing and Ranging Station for use as a lookout.

The nature of the reinforced concrete structure of the defunct buildings, in the exposed costal environment, makes it inevitable that without extraordinary intervention these structures will continue to corrode, split apart, deteriorate, and collapse to a state of rubble.

Allowing the unused but generally intriguing and distinctive structures to weather without intervention presents a primary problem of public safety. This presents in two forms: the potential for actual structural failure with collapse of suspended elements and associated risk of injury from a fall, and the danger posed by sharp edges of concrete and exposed corroded steel. Although presently the structures have some enclosure and legibility of the former form, a further decade of exposure to weather is likely to see the suspended sections of all buildings largely collapse. Allowing the design life of the structures to come to a natural end, and allowing the structures to settle into ruins, has the dual problem of managing public safety and of potential loss of capacity for understanding and appreciation of some level of the heritage significance of the place.

For description and condition of the structures refer to *Appendix A: General Condition Observations and Base Plans* prepared by David Hogg of Quatrefoil Consulting Pty Ltd.

Further to the work undertaken in 2025 setting out an approach to make safe and manage the ruins of the defence emplacements the proposal to reconstruction the roof slabs of the Direction & Ranging Station to provide utility as a lookout has been developed.

Whilst the replacement of the postwar stairs and balustrades go beyond conservation the reconstruction of the roof slab to replicate the 1942 form is considered an appropriate heritage outcome likely to secure longer-term conservation through the utility offered to the public as a lookout and as an opportunity for interpretive experience.

Description

The former Direction and Ranging Station is located some 100 metres west of the lighthouse just off the path from the lighthouse along the ridge of the dunes. The building is divided into two sections with upper and lower viewing rooms. It is clear from the visible concrete that the building has been constructed at two different periods with the upper western section constructed as possibly unreinforced concrete during WW1 and then modified to add the eastern lower roof and access steps and the roof and upper walls to the western section as reinforced concrete. The lower viewing room has been designed to have unsupported corners for unobstructed view by casting a steel beam into the roof slab that is then supported by a down-stand encased steel beam spanning diagonally across the room. Recent additional struts have been provided at the corners of both upper and lower rooms.

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In the centre of the lower chamber is a concrete pillar on which was mounted the ranging gear shown in use in Figure 7. To the north the concrete paths have been exposed by erosion of sand and the building has been almost entirely stripped of the joinery to doors, windows and other fittings visible in Figures 1 and 7.



Figure 2 Direction & Ranging Station from the north (JBA)



Figure 3 Direction & Ranging Station from the south (JBA)



Figure 4 Direction & Ranging Station from the west (JBA)



Figure 5 Direction & Ranging Station from the east (JBA)

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Figure 6 Direction & Ranging Station interior of lower chamber (JBA)



AWAS Gunners Thompson & Alchin 1944, at Point Lonsdale (AWM)

Figure 7 Direction & Ranging Station with war time training drill



Figure 8 Direction & Ranging Station interior of lower chamber (JBA)



Figure 8 View to the east



Figure 9 View to the west (JBA)

Heritage Significance

The site is currently listed on the Victorian Heritage Register maintained by the Victorian Heritage Council, and is designated entry H1517. The *Point Lonsdale Lighthouse Precinct* is included in the Queenscliffe Planning Scheme at the Schedule to the Heritage Overlay, Clause 43.01 as HO84. The mapped area of the Heritage Overlay matches the area of the Heritage Victoria Registration of the *Point Lonsdale Maritime and Defence Precinct*, as shown on Diagram 1517.



Figure 10 Queenscliffe Planning Scheme Heritage Overlay Map of the Point Lonsdale Lighthouse Precinct

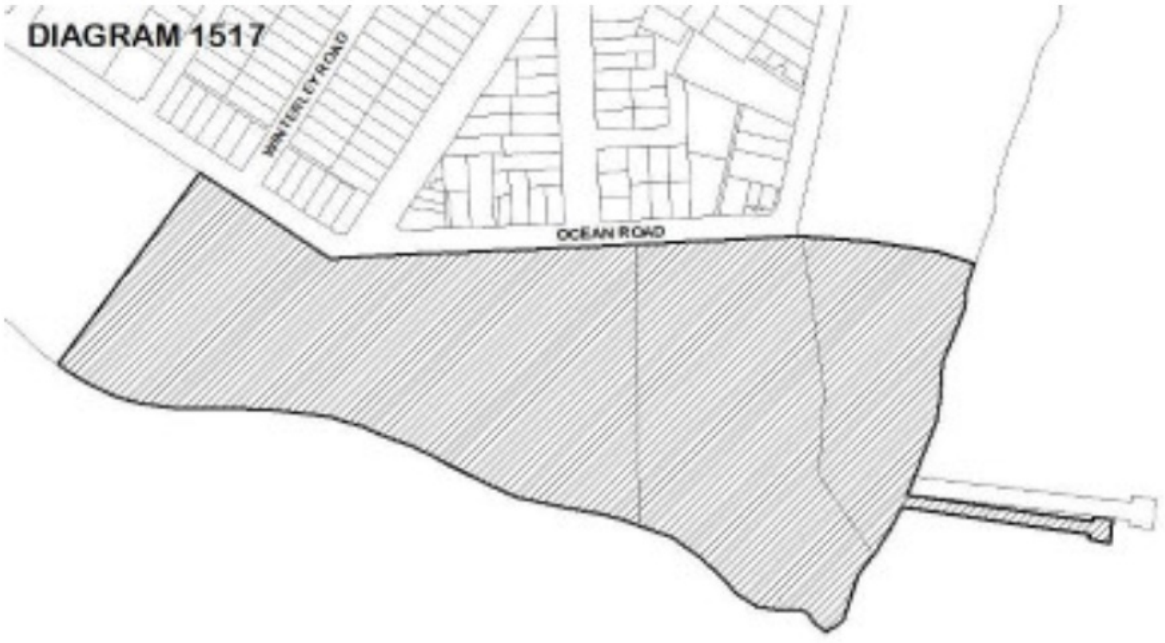


Figure 11 Victorian Heritage Registration Diagram 1517 of the Point Lonsdale Maritime and Defence Precinct

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Figure 12 Aerial image of the Point Lonsdale Maritime and Defence Precinct area

The statement of significance from the Heritage Victoria citation for the *Point Lonsdale Maritime and Defence Precinct* is retrieved from the Victorian Heritage Database, last updated in 2022. An earlier Statement of Significance, also available from the Victorian Heritage Database at the Citation for HO84 copies the HC citation is included for demonstration of the change in understanding and heritage practice from 2009 to 2022, particularly in relation to evolving convention of format and content of a statement of significance.

The 2022 statement of significance is as follows:

> ***What is significant?***
>
> *The Point Lonsdale Maritime and Defence Precinct including all buildings, structures, objects, ruins and archaeological features and deposits related to the location's strategic role in both defence and maritime navigation and rescue. Buckley's Cave is also significant for its association with William Buckley.*
>
> ***How is it significant?***
>
> *The Point Lonsdale Maritime and Defence Precinct is of archaeological and historical 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 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 and objects.

Why is it significant?

The Point Lonsdale Maritime and Defence Precinct is significant at the State level for the following reasons: Point Lonsdale Maritime and Defence Precinct is historically significant for the strategic role it has played in maritime navigation and rescue since the 1850s. The establishment of maritime navigational aids at Point Lonsdale was key in assisting the safe passage of vessels from Bass Strait into Port Phillip Bay. Safe passage through this stretch of water was important in the development of Melbourne as a major port. The Point Lonsdale Maritime and Defence Precinct is also historically significant its role in maritime rescue and its connections to the numerous shipwrecks that have occurred off its coast. [Criterion A]

The Point Lonsdale Maritime and Defence Precinct is also significant for its associations with the military in both World War I and World War II. Its strategic location at the entry to Port Phillip Bay made it key in the defence of Victoria from potential seaborne attack. It was one of a network of strategic defence locations around Port Phillip Bay, that also includes Point Nepean and Shortlands Bluff. [Criterion A]

Buckley's Cave is significant as it is widely believed that William Buckley sheltered here. Buckley was an absconder from the 1803 camp at Sullivan Cove near Sorrento. He is a key figure in early contact between Aboriginal and non-Aboriginal people around Port Phillip Bay. [Criterion A]

Point Lonsdale Maritime and Defence Precinct is archaeologically significant for its potential to contain archaeological remains, features and deposits relating to the location's maritime and defence history. Valuable information is likely to be yielded about the place's maritime functions throughout various eras of its operation. Information is also likely to be yielded about the lives of personnel stationed at Point Lonsdale during World War I and II. [Criterion C]

The Point Lonsdale Maritime and Defence Precinct is significant as both a notable maritime precinct and a notable defence precinct. Located strategically at the dangerous entry point to Port Phillip Bay, it contains an array of buildings and other features which demonstrate maritime navigation and rescue techniques and technologies from various eras. The

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Lighthouse is notable for its early use of reinforced concrete. The precinct also contains examples of a range of elements associated with the defence of Port Phillip Bay during World War I and World War II. [Criterion D]

The Statement of Significance for the Point Lonsdale Lighthouse Precinct covered by the Heritage Overlay HO84(excluding the Western Gun Emplacement) was updated in 2009 and remains available on the Victorian Database. This 2009 statement of significance, which followed the then Heritage Victoria statement of significance framework, is as follows:

What is significant?

The Point Lonsdale Lighthouse precinct consists of the lighthouse and associated buildings [both extant and ruins], and defence structures associated with the First and Second World Wars. The area was first used in the mid-nineteenth century for the construction of navigational structures to guide vessels through the Heads of Port Philip Bay.

European discovery of the entrance to Port Phillip Bay occurred in 1802 when Acting Lt John Murray in command of the Lady Nelson sighted the promontories now known as Point Lonsdale and Point Nepean. With the later exploration of Port Phillip Bay and the consequent development of the towns of Geelong and Melbourne, safe navigation through the dangerous Port Phillip Heads was of critical importance. The promontory at Point Lonsdale provided an obvious location for the placement of navigational guidance structures. Although a flagstaff had been manned from 1852 and a warning light shown, the first lighthouse was not erected until 1863 when the former timber leading light at Shortlands Bluff which had been constructed in 1853-54 was relocated to Point Lonsdale. Lighthouse keepers' quarters [since demolished] were also constructed in the 1860s and in 1884, a weatherboard foghorn shed was constructed at the site. In 1891 a building for the storage of explosives held to blast a navigation channel near the jetty constructed was erected in the place of a former powder magazine. The store was later used as a rocket shed. The jetty was erected c.1890 to house a lifeboat in accordance with the recommendation of the Commissioner of Customs following the wreck of the barque Glaneuse in 1886.

The Point Lonsdale Lighthouse constructed in 1901-02 is the last remaining of the three successive light structures erected at Point Lonsdale. The lighthouse was designed by the Public Works Department and the reinforced concrete structure was erected by the contractors Coates Brothers. The lighthouse was first lit on 20 March1902. In 1951 an octagonal structure housing the signal station and observation room was built around the base of the lighthouse.

The principal light station related structures remaining at the point are the lighthouse [1901-02], fog horn shed [1884], the rocket shed, which contains two rare vertical boilers [1891], the jetty [c1890], the scend shed [1941], the signal mast [1951], and the remains of the lighthouse keepers quarters [1860s].

The Point Lonsdale lighthouse is of a traditional design consisting of a shaft and capital and closely follows the form of many late nineteenth century Victorian lighthouses. The structure is mass concrete tower similar in construction to the earlier Point Hicks lighthouse. The structure is surmounted by a Chance Brothers lantern. The original oil lamp of the light was replaced first with an acetylene light and later an electric light. Half way up the shaft is a cantilevered platform supporting red and green navigation lights which replaced a subsidiary light original to the 1901-02 structure.

While Point Lonsdale had always been of strategic defence interest, it was the outbreak of the First Word War which prompted the construction of defence structures in the vicinity of the lighthouse. Two search light emplacements, an electric light directing station and engine house were constructed in 1914. Further defence structures were erected in response to the commencement of the Second Word War. A new concrete emplacement, now the scend shed, was constructed in 1941 and two gun emplacements and a fire directing emplacement were added in 1942. At about the same time, the Point Lonsdale defence camp was erected. The camp, consisting principally of P1-type huts, initially accommodated the 7 Australian CRE [Works] and with a small area set aside on the east side of the Point Lonsdale Road for the Australian Women's Army Service [AWAS]. At the height of the war, there were fifteen camp buildings at Point Lonsdale. In 1946, the service personnel social and benevolent organization Toc H applied to use the camp buildings as holiday accommodation for children of former members of the services. Toc H later purchased the buildings and continues to lease the land from the Victorian Government.

How is it significant?

The Point Lonsdale Lighthouse precinct is of architectural, historical and archaeological significance to the State of Victoria.

Why is it significant?

The Point Lonsdale Lighthouse precinct is of historical significance for its association with the maritime and defence history of Victoria. The lighthouse structures in the precinct demonstrate the importance of a system of navigational aids in a time when shipping was of singular significance in maintaining commercial links between Melbourne and Geelong and Britain and Australian colonial ports. The Point Lonsdale lighthouse was of critical

importance as the first guiding light to the entrance of Port Phillip Bay visible from sea. The defence group is of historical significance for the range of fixed defence structures within the site, reflecting the importance of the defence of Port Phillip Bay and the major cities of Melbourne and Geelong during the duration of both the First and Second World Wars. The P1-type huts are of interest for their association with the 7 Australian CRE [Works] division, the Australian Women's Army Service [AWAS], and the Toc H organization.

The Point Lonsdale Lighthouse group of buildings is of architectural significance for its lighthouse which is a typical and aesthetically pleasing example of an early 20th century lighthouse design, and the ancillary structures and fittings. The fog horn shed is the only known fog horn shed at a Victorian lighthouse and the two vertical boilers which provided the power for the steam operated fog-horns are rare in their original setting. While there are rocket sheds at three other Victorian light stations the rocket shed at Point Lonsdale is the only one located in close proximity to a lighthouse.

The Point Lonsdale Lighthouse precinct is of archaeological significance for its potential to reveal significant artefactual remains pertaining to the use of the place as a lightstation and signal station. Sites in the vicinity of the demolished keeper's buildings have a high archaeological potential.

The State level heritage significance of the defunct defence structures and the rocket shed are clearly established. From the public perspective the ruins of the defence structures, in their distinctive setting and with distinctive form, can be readily understood and appreciated with regard to their original purpose. The structures convey significant aspects of history of the last century, and particularly embody and represent an aspect of the Australian response to the aggression of two world wars, which perhaps marked the last century and history of humanity more than have any other episodes or events.

The deteriorated condition of reinforced concrete structures also embodies the reality that since the caseation of hostilities in September 1946 there has been no menace of maritime attack upon Melbourne or Port Phillip Bay. In this regard, the character of the former defence structures as 'ruins' is also an aspect of the heritage significance of the Point Lonsdale Maritime and Defence Precinct, as demonstrative of the relative peace that has been enjoyed for 80 years. It can be contended that the evidence of age of the defence structures is of significance, as is the understanding and appreciation of the original bespoke use of the distinctive structures. As with many ruins the defence emplacements convey a mystique of a past period that was very different from that experienced by most Victorians, and by our visitors today. Ruins also present a distinctive 'aesthetic' experience. This aesthetic is related to the sense of depth of time conveyed by patina and weathering of fabric which

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is product of slow natural process. It is the natural weathering that conveys age and is difficult to emulate without producing very un-authentic outcomes that undermine the aesthetic value of a place which developed over time.

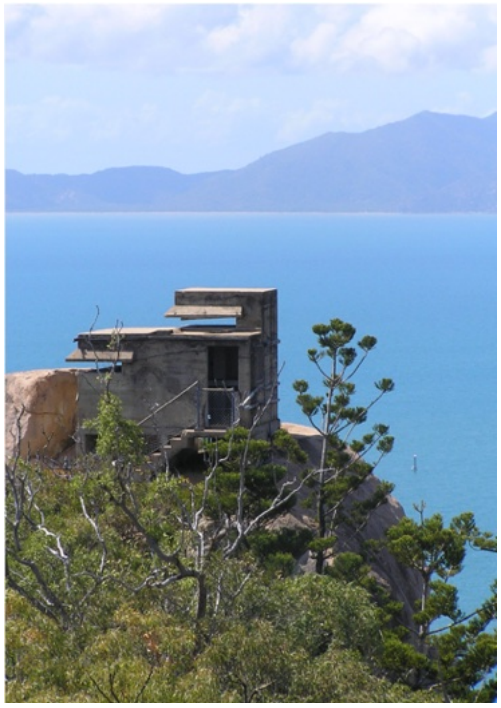




Figure 13 & 14 Related Direction and Ranging Station on Magnetic Island and with camouflage during WW2.



Figure 15 Magnetic Island command building with added balustrading.

Heritage Act Controls

The protection of the Point Lonsdale Maritime and Defence Precinct is provided under the Victorian Heritage Act, 2017 (the Act). The first purpose of the Act is:

(a) to provide for the protection and conservation of the cultural heritage of the State;

Part 5 - Permits, controls any removal, relocation, demolition, or alteration of any part of the heritage place including repairs and maintenance. Permits are to be determined under the Section 101 of the Heritage Act, amongst other considerations with regards to:

(a) the extent to which the application, if approved, would affect the cultural heritage significance of the registered place or registered object;

(b) the extent to which the application, if refused, would affect the reasonable or economic use of the registered place or registered object;

Under the definitions of the Act:

conservation includes—

(a) the retention of the cultural heritage significance of a place or object; and

(b) any maintenance, protection, preservation, restoration, reconstruction or sustainable use of a place or object;

At Sections 152 and 153 the Heritage Act addresses the requirements in relation to maintenance and owner's obligation with regard to repair:

152 Disrepair of registered place or registered object

The owner of a registered place or registered object must not allow that place or object to fall into disrepair.

153 Failure to maintain registered place or registered object

The owner of a registered place or registered object must not fail to maintain that place or object to the extent that its conservation is threatened

Heritage Victoria in 2022 published: *Principles for considering change to places in the Victorian Heritage Register*. This paper provides a condensed outline of five principles for conservation of places, derived from the Burra Charter.

The Burra Charter (the Australian ICOMOS Charter for Places of Cultural Significance) was endorsed by Heritage Victoria in 2010, and by the Heritage Council of Victoria in 2013, as a key document for guiding best-practice cultural heritage management in Victoria. The approach for management of the conservation of the defunct defence structures and the rocket shed is underpinned by the principles

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set out in the Articles of the Burra Charter. The discussion below explores these principles, following the definitions of conservation and related terms that are used in the Heritage Act as addressed above.

Definitions of Conservation and Related Actions

The following are the definitions for the respective terms provided by the Burra Charter:

> *1.4 Conservation means all the processes of looking after a place so as to retain its cultural significance.*
>
> *1.5 Maintenance means the continuous protective care of a place, and its setting.*
>
> *Maintenance is to be distinguished from repair which involves restoration or reconstruction.*
>
> *1.6 Preservation means maintaining a place in its existing state and retarding deterioration.*
>
> *1.7 Restoration means returning a place to a known earlier state by removing accretions or by reassembling existing elements without the introduction of new material.*
>
> *1.8 Reconstruction means returning a place to a known earlier state and is distinguished from restoration by the introduction of new material.*

The explanatory notes introduce the term "*protective care'* in relation to conservation and maintenance, and provide the following examples:

> • *maintenance — regular inspection and cleaning of a place, e.g. mowing and pruning in a garden;*
> • *repair involving restoration — returning dislodged or relocated fabric to its original location e.g. loose roof gutters on a building or displaced rocks in a stone bora ring;*
>
> • *repair involving reconstruction — replacing decayed fabric with new fabric*

Given the defunct and deteriorating condition of the defence emplacements the Explanatory Notes from the Burra Charter that address '*preservation'* have particular pertinence: *It is recognised that all places and their elements change over time at varying rates.*

Reconstruction as Repair

The nature of concrete cancer is such that the reinforcing integral to the integrity of suspended elements is prone to failure. '*Repair*' in effect requires the '*reconstruction*' of deteriorated sections of the former defence buildings, involving removal of effected reinforcing and concrete cover and replacement with new material to match the original, to the extent practicable. The construction, character, and detail of the reinforced concrete emplacements is unremarkable for the original period

and with appropriate care could now be closely emulated in reconstruction of deteriorating parts. With further careful consideration and trialling of sample finishes and methodology it would also be possible to reproduce some of the effect of age and patina such that new sections, such as roof slabs, could provide a reasonable replication of the elements prior to structural failure.

The two categories of reconstruction to be considered are: re-construction of sections of damaged concrete elements, and re-construction of surface finishes to 'restore' a known early appearance.

Burra Charter Conservation Principles

The Conservation Principles provided in the Burra Charter are set out at Article 2:

Conservation and management

2.1 Places of cultural significance should be conserved.

2.2 The aim of conservation is to retain the cultural significance of a place.

2.3 Conservation is an integral part of good management of places of cultural significance.

2.4 Places of cultural significance should be safeguarded and not put at risk or left in a vulnerable state.

Article 3. Cautious approach

3.1 Conservation is based on a respect for the existing fabric, use, associations and meanings. It requires a cautious approach of changing as much as necessary but as little as possible.

3.2 Changes to a place should not distort the physical or other evidence it provides, nor be based on conjecture.

The competing concerns with regards to the nature and condition of the defence emplacements are raised in Articles 3.1 and 3.2.

Condition Observations

The description and condition of the Direction and Ranging Station is provided in the *Structural Assessment*, November 2024 prepared by Quatrefoil Consultants Pty Ltd at section 6.2 and is copied below:

The most significant deterioration is all associated with the 1942 works in this building. There is extensive spalling to roof slab soffits and local areas of spalling to walls where cover is low and at cast in steel sections. The top surface of the slab appears to be in reasonable condition but would still allow moisture into the fabric which would assist with corrosion

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due to carbonation and chloride and sulphate ingress from the atmosphere. The extensive corrosion to the slab soffit but not the top suggests little to no upper reinforcement.

For the roof slabs and reinforced sections and in accordance with the adopted approach to remediation outlined above, remediation should be aimed at preventing collapse and removing significant safety issues until such time as reconstruction or removal is undertaken. Provision of temporary roofing over the existing may assist with slowing down deterioration by limiting moisture ingress into the fabric, however the atmospheric conditions will still prevail and damage can be expected to slowly increase.

The original 1914 walls appear reasonably sound and do not require intervention at this time.

Proposed Conservation and Activation Works

In considering the heritage significance of the defunct defence structure of the Direction & Ranging Station, and the conservation of significance, it was noted in 2024 that there was no current use, or likely futures adaptive reuse, of the defence buildings. For the Direction and Ranging Station whilst no use is proposed for the two interior spaces the reconstruction of the upper roof slab offers the opportunity to once again utilize the structure as a public lookout. This would provide safe public exposure to the building and provide opportunity for interpretation of the defence history of the Reserve.

The lower roof slab and remainder of the building are to be treated as 'artifacts', no longer having utility value, or to be occupied, but having value as heritage objects, for which curatorial care can is to be provided with the remedial works set out in the drawings 7901-Building 2-Issue B, (lookout) prepared by Quatrefoil Consulting Pty Ltd, dated March 2026.

The reconstruction of the upper level slab is to match the from and appearance of the existing original slab, with the exposed reinforcing, spalling and damage to the lower roof and walls to be in accordance with the report titled *Structural Assessment of Selected Former Observation, Searchlight and Gun Emplacements at Point Lonsdale Lighthouse Reserve* prepared by Quatrefoil Consulting Pty Ltd are as set out in 5.4 *Adopted Approach* in the *Structural Assessment* and in the section including *Discussion and Recommendations* at section 6 where each emplacement is addressed individually.

The approach of making safe the building and taking what palliative actions that are reasonable to slow deterioration of the steel and concrete of the structure.

As set out on Dwg RW22-B it is proposed to:

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Remove projecting reinforcement and jagged concrete faces with exposed steel to be treated with Sika Ferroguard – 903.

Local loose and drummy areas of concrete are to be removed and patched.

Trials are to be undertaken to ensure the appearance and other properties of the patch repairs complement the adjacent original fabric.

Exposed steel members and props are to have loose rust removed with exposed steel coated with two coats of zinc rich primer as per the Engineers instruction.

A protective coating of Dulux Surface Shield HD is proposed of the top surfaces of the new upper slab and over the existing lower slab to limit moisture penetration through the slabs.

The new stair and balustrade are to be as shown on the drawings 7901-Building 2-Issue B, (lookout). The stair and balustrade are to be of standard components of similar type to the pipe and fittings evident in the 1961 photograph but with fall protection to current standards for safe public access.

Assessment of Impact

The approach set out above by David Hogg is congruent with the discussion advanced in *Conservation - Approach, Principals and Controls* presented in the *Heritage Impact Statement* from March 20204. This approach is in compliance with the cautious approach of Article 3 of the Burra Charter, which is to do as little as possible but as much as necessary, taking care not to distort the evidence of the place. The reconstruction of the upper level roof slab to replace the existing deteriorated roof slab with like for like detailing will not distort, or occlude, understanding and appreciation of the heritage significance of the place. The replacement of the balustrades and stairs that were installed in the post-war to allow the Direction and Ranging Station to be accessed safely as a public lookout provides a utility value to the site to support the reconstruction of the roof slab and repair and make safe of the remainder of the structure.

In conjunction with proposed roof reconstruction works, and stabilization works to the remainder to the structure it is recommended that there be consideration of developing interpretative material of the Point Lonsdale Maritime and Defence Precinct, with historical content (such as heritage photographs and access to the history provided in the November 2017 Submission to the Australian Heritage Council, 3D imagery, or walk through records) perhaps available through QR Code links.

It is for the reasons above that in my assessment the most appropriate response to the heritage place, at least for the foreseeable future, is to do as little as possible in accordance with the works proposed in the Structural Assessment by Quatrefoil Consulting Pty Ltd.

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The activation of the Direction and Ranging Station as a lookout with safe access for the public addresses the evident interest and desire that leads many people to pass the existing barriers and climb the building for the view of the ocean and Reserve.

The reconstruction of the failing roof slab is a desirable conservation outcome and the introduction of the stair and balustrade, whilst and obvious addition, is aligned with the original use of the Station and has no adverse impact upon the heritage fabric of the building. The reinforced concrete structure of the roof is unremarkable in detail for the periods of construction and can be effectively replicated to match the original fabric.

The proposed approach to the other defence emplacement of the Reserve is the 'palliative' approach of 'managed decline' of the heritage fabric. This approach accepts that the fabric of heritage places deteriorates depending on material and circumstances, and importantly the deterioration itself may have importance as a marker of time. The character of the structures in decline 'as ruins' with any utility value consigned to a period long past can be considered as important as the legibility of the original form and detail. The use as the ruin as lookout is appropriate.



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