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Finn Pratt AO
Secretary
Department of the Environment and Energy
GPO Box 787
Canberra ACT 2601

E: ciu@environment.gov.au

Dear Mr Pratt

Australian War Memorial Development Proposal

The Australian Institute of Architects (the Institute) is currently involved in facilitating public and professional interest and comment on the intention of the Australian War Memorial (AWM) to demolish the Sir Zelman Cowen Award winning ANZAC Hall as part of a development proposal for the site.

The Institute is writing to you because of the responsibility of the Department of Environment and Energy (DEE) to administer the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act). The Institute has significant concerns about the process followed by the AWM in relation to heritage considerations for this project, in particular the extent to which the project has now progressed without the relevant heritage approvals in place.

The AWM has widely and very publicly committed itself to a development proposal that includes the removal of ANZAC Hall. The AWM has now completed a detailed business case for the development, received significant Commonwealth Government funding, and requested Expressions of Interest (EOI) for architectural design services. The detailed business case recommends the demolition of ANZAC Hall; the EOI only allows for 'reference design' options which include the demolition of ANZAC Hall; and yet the proposal has still not received approval under the EPBC Act. The AWM continues to present the proposal as a *fait accompli* and suggests that the 'reference design' is approved by government.

The AWM, a National and Commonwealth Heritage Listed place includes ANZAC Hall and its values. The AWM has legislative obligations for the protection and conservation of the heritage values for all Australians. To date, there appears to be no independent heritage impact assessment of the proposal commissioned by the AWM, nor is there one that is readily available to the Institute (or the public). It is also not apparent that the Memorial has liaised effectively or to the extent required for such a significant project with the DEE, National Capital Authority or other identified stakeholders to properly assess the proposal's impact on the identified heritage values of the site.

There is significant and growing concern from professional bodies and the wider community about the development proposal.

The AWM Heritage Strategy, item 1F, refers to the process for resolution of conflict arising from the assessment and management of Commonwealth Heritage Values. The Memorial is required to have in place appropriate procedures for conflict resolution (EPBC Regulations Schedule 7C 1(d)) to resolve any differences arising from the assessment and management of Commonwealth Heritage values. Item 1F indicates among other things that:

- The Memorial must ensure appropriate consultation occurs to allow relevant expertise to be taken into account in all decisions that have the potential to impact the heritage values.
- Advice from the DEE, Heritage Division may be sought to help resolve issues of heritage values and their management.
- Independent expert heritage advice may also be sought when required to resolve matters of conflict relating to the assessment and management of the heritage values.

The Institute strongly recommends the AWM undertake further consultation and seeks independent expert heritage advice on the development proposal as required by its legislated Heritage Strategy and Heritage Management Plan. The Institute also suggests that any DEE role in facilitating the resolution of this conflict is made clear to the AWM by DEE and that this is undertaken as soon as possible.

While the AWM has now stated that it intends to make the appropriate submissions to the Minister of the Department of the Environment and Energy, it is not clear when the AWM proposes to do this. In anticipation of a referral under the EPBC Act by the AWM, the Institute provides the following comment to you, for consideration under the EPBC Act, relating to the AWM development proposal, and relevant detail from the AWM National and Commonwealth Heritage Listings, and the AWM Heritage Management Plan 2011:

From National Heritage Values

The AWM in its setting is of outstanding importance for its aesthetic characteristics, valued as a place of great beauty by the Australian community and veteran groups (as represented by the Returned & Services League of Australia)..... The main building and the surrounding landscape, the Hall of Memory, the Roll of Honour, ANZAC Hall and the collections act as reminders of important events and people in Australia's history and trigger disturbing and poignant responses from the vast majority of visitors.

From the Commonwealth Heritage Listing

The design for the new hall, called ANZAC Hall, consisted of a large wall 20 metres behind the main building to act as a backdrop to the iconic main building. The bulk of the building was dug into the ground so that it could not be seen from ANZAC Parade, with a large curved metal roof fanning out from the centre point of a dome behind the wall.

The success of the Memorial as a landmark is due in part to its distinctive massing and symmetry; its relative visual isolation given its privileged siting on the land axis; landscaped grounds and the backdrop of the forested slopes of Mount Ainslie).

The open space of the landscape surrounds of the building and the natural landscape of the Mount Ainslie backdrop are important features of the complex.

From the AWM Heritage Management Plan, 2011

The addition [ANZAC Hall] was carefully designed by architects Denton Corker Marshall to sit comfortably within the immediate vicinity of the original building.

The large structure is excavated into the rising site so that it sits below the bulk of the main building and is separated from it. A large blank facade addresses the rear of the original building, punctuated only by the simple glass link bridge. The structure's curved roof falls away from this blade wall and the main space fans out from it, to provide an open 3,098 square metres of exhibition space and a maximum height of 10 metres. There are few external openings, except for the narrow verticals of the punched openings to the raised platform of the outdoor café, on the eastern elevation. With battered walls and a curved turret roof design, the structure evokes a battleship. This is reinforced by the external cladding of deep grey, metal panels forming a neutral backdrop to the rich texture of the sandstone facing of the original.

The Memorial is part of a larger landscape setting which is structured by the land axis and includes ANZAC Parade, as well as the Remembrance Nature Park on the slopes of Mount Ainslie behind the Memorial. The success of the Memorial as a landmark is due in part to its distinctive massing and symmetry; its relative visual isolation given its privileged site on the land axis; the landscaped grounds and the backdrop of the forested slopes of Mount Ainslie.

1.3 Conservation Processes. Ensure all new developments contribute to the heritage values of the AWM Campbell Precinct and its qualities as a unique place of symbolic importance to the nation.

1.11.1 Conservation Processes. Maintain the dominant nature of the AWM on the land axis, including ANZAC Parade, ensuring that its visual isolation is protected and that new buildings in the vicinity of ANZAC Parade do not impact upon views to and from the AWM.

1.12.5 Conservation Processes. Ensure that the ability to perceive the AWM main building 'in the round' within its landscape setting is not comprised by any new surrounding development or impact on significant views to the building.

3.1.1 Stakeholder Consultation and Community Involvement. Consult broadly on proposals with the potential to impact on the heritage values and national cultural and symbolic significance of the AWM Campbell Precinct. Consultation should be broad, look to recognise "community voice" and enacting this should be real and genuine.

ANZAC Hall is described as displaying only Medium Tolerance for change of the heritage values. Medium Tolerance is described as: *The architectural form/design, location and use of the place embody the heritage significance of the component and its contribution to the AWM Campbell Precinct. The component should be retained and conserved. However, it may be altered to some degree without adverse impact on heritage significance.*

ANZAC Hall is an integral part of the AWM Commonwealth and National Heritage Listing and must be treated as such, not just physical impacts but intangible values will be impacted. It has only "medium tolerance for change" and should be retained and conserved. It is architecturally impressive and meets all stringent heritage requirements for the site. It is carefully designed to not compete with or impact on the main building. Its discrete separation maintains the critical architectural isolation of the main building in the site and allows appreciation of the main building in the round including when viewed from Mount Ainslie.

The AWM must demonstrate custodianship for future generations, and should not be responsible for irreversible, significant actions impacting the heritage values.

The AWM's proposed demolition of ANZAC Hall does not respect the National and Commonwealth Heritage values of that building and the site.

Very important heritage values include reverence and commemoration. A newly overdeveloped site will significantly impact the National and Commonwealth Heritage Listing Values. These values cannot be replaced with “offsets”. Demolition cannot be recovered by offsetting.

The proposed new replacement structure comprises two dominant box structures with a consistent height profile through to Treloar Crescent (unlike ANZAC Hall which dramatically reduces in height towards Treloar Crescent). The boxes are attached to the rear of main building by an 11.3m high glass atrium. This arrangement crowds the site and impacts significantly on the appreciation of the original building in the round and the critical sense of isolation of the original building in the site. There is a significant physical and aesthetic impact on the original building by the proposed ‘box’ design and attachment of an atrium. The impact on the view of the site from Mount Ainslie is significant. Energy consumption for climate control of the atrium is also an issue as is the potential impact on the conservation of objects displayed in the glass atrium.



from AWM REOI2019/O161. Artists impression of the ‘reference design’.

The Institute also draws your attention to other elements of the AWM development proposal:

Southern frontage Research Centre ‘shop-front’. The southern extension of the CEW Bean Building to provide a south facing high profile shop-front attached to, and mimicking, the existing Eastern Precinct Café crowds the Café Courtyard and significantly alters the less formal and open character of the Eastern Precinct.

The proposal impacts on the architectural quality of the Sir Zelman Cowen Award winning Eastern Precinct development and its carefully designed separation from the main building, and further reduces the sense of isolation of the main building in the landscape.



from AWM REOI2019/O161 Artists Impression of the New Research Centre

Increased scale and rectangular shape of the Parade Ground. The Parade Ground was redeveloped in 2006 and only has a medium tolerance for change. The proposed change to the Parade Ground to a larger and more rectangular shape challenges the relationship between scale of the elements of the site. The proposal is too large and dominant and detracts considerably to the sense of isolation in the landscape of the main building. The sense of place and scale of the Stone of Remembrance at the head of the Parade Ground is also impacted. The change in scale and geometry of the Parade Ground does not recognise the heritage significance and scale of the existing axial design which successfully enhances the relationship between the AWM and ANZAC Parade.



from AWM REOI2019/O161 Artists Impression of the (new) Parade Ground

Additional issues include:

- Excessive development that dominates the capacity and function of the AWM to “act” as a place of quiet contemplation and reverence and a “memorial”.
- The AWM is acting in a way that is “excessive” and irreverent – contrary to the National heritage significance – intangible, not just physical significance.
- The AWM has recently demonstrated poor performance in the heritage management of the Taglietti Mitchell repository (still no listing and no obvious conservation works)

We trust that this information will be useful to your department when the AWM refers the redevelopment proposal for consideration under the EPBC Act.

If you require any more information, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, reading "L Hardwicke". The signature is written in a cursive, flowing style.

Leanne Hardwicke
General Manager, Policy, Advocacy and Education
Australian Institute of Architects