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RE: Australian War Memorial (AWM) Redevelopment Referral (2019/8574)

Dear Department of Environment and Energy,

The Australian Institute of Architects (the Institute) is the peak body for the architectural profession in Australia, representing around 12,000 members. The Institute works to improve our built environment by promoting quality, responsible, sustainable design. Architecture influences all aspects of the built environment and brings together the arts, environmental awareness, sciences and technology. By combining creative design with technical knowledge, architects create the physical environment in which people live, which in turn, influences quality of life. Through its members, the Institute plays a major role in shaping Australia's future.

The Institute welcomes the opportunity to make a submission on the Australian War Memorial (AWM) redevelopment referral under the *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act 1999)*. The Referral covers some aspects of a proposed major redevelopment of the AWM that was announced by the Prime Minister on 18 November 2019.

The Referral covers the demolition of Anzac Hall and its replacement with a larger structure that would be connected via a full width glazed courtyard added to the northern end of the main Memorial building and a new southern entrance that will see visitors use a new lower ground entrance that will provide improved accessibility, rather than the existing ground level steps leading directly into the building.

OVERVIEW COMMENTS

The Institute has significant and ongoing concerns about the redevelopment project regarding the planned demolition of Anzac Hall and threats to the heritage value of the site, including the nationally significant Eastern Precinct Development.

The Institute recognises the need and in principal understands that ongoing development of the AWM will include the provision of more exhibition space. However, it is essential that the National and Commonwealth heritage values and solemn purpose and nature of the site as a memorial are retained in all decision making processes.

Ashley Built Heritage has undertaken an independent Heritage Review of the redevelopment project Referral under the *EPBC Act 1999* and this comprehensive document is provided for the benefit of the department in its consideration of the Referral at [Appendix A](#).

Ashley Built Heritage has identified that the current redevelopment proposal has significant heritage impacts arising from the bulk, scale and location of the new work such that further detail and minor modification would not remove that significant impact.

In summary, the Referral project would have three significant adverse impacts. The first from the bulk and visibility of the glazed courtyard addition to the Memorial that would result in a loss of the visibility of the Memorials' architectural values and form associated with its deeper meaning as a shrine.

The second significant impact would be the demolition of the award-winning Anzac Hall that is a highly contributory component of the AWM Campbell Precinct, carefully set back from main Memorial to protect its setting while still having its own architectural qualities of the highest order.

The third key impact is the change in the arrival experience to the AWM that essentially will result in a reduction, delaying and obscuring what currently is an immediate and profound experience of the memorial aspect.

In addition, the Referral does not comply with a number of the policies contained in Heritage Management Plans (HMP) for the AWM, including in particular the 2011 and the 2019 HMPs that require the retention, conservation and interpretation of Anzac Hall.

PLANNED DEMOLITION OF ANZAC HALL

The AWM is included on the Australian Institute of Architect's register of Nationally Significant 20th-Century Architecture. In 2005, Anzac Hall received the Institute's Sir Zelman Cowen Award for public buildings for its design excellence. The award citation included 'The materials of stone, concrete, metal and glass meld well with the heritage qualities of the existing building, and the powerful and contemporary form of the new building complements the old.' The Anzac Hall also received the Canberra Medallion in the same year.

There is a direct relationship between recognition by groups such as the Institute (and others such as Engineers Australia) for the work of their peers and the eventual recognition of values by the broader community through heritage listing. The AWM heritage listings already acknowledge the contribution of Anzac Hall to the precinct. Given time, it is extremely likely that Anzac Hall would obtain a direct heritage listing in its own right. The current and pending HMP's (2011 and 2019) also recognise the importance of Anzac Hall to the AWM Campbell precinct and require that Anzac Hall be retained and conserved.

HMP 2019 is quoted extensively in the Heritage Impact Assessment (HIA) but it is not yet approved. However, this policy requires the retention of Anzac Hall. At the same time, the Memorial is putting forward a proposal that requires the demolition of Anzac Hall. As a minimum the Referral should be put aside while accreditation of the HMP 2019 happens and the Referral scheme revised to comply with that policy.

REVIEW OF REFERRAL HERITAGE IMPACT STATEMENT

The overall methodology used in the HIA report has been reviewed by Ashley Built Heritage and is considered to be reasonable and to have followed accepted practice, such as addressing comparative analysis of similar places and using the identified heritage values.

However, the assessment does not specifically identify the noncompliance of the proposal with the policies in both the HMPs 2011 and 2109 including:

- 1.11.2: the new development not impinging on the silhouette of the AWM from the land axis and that the height is less than the parapet of the AWM main building;
- 1.12.1: the symmetry of the existing building design is respected;

- 1.12.5: the ability to perceive the main Memorial 'in the round' is respected;
- 1.11: that Anzac Hall is conserved, managed and interpreted as a part of the AWM main building; and
- 1.11.1: the important architectural qualities of Anzac Hall are respected and managed for future change to ensure it is in keeping with the original design and sympathetic to the heritage values of the AWM Campbell Precinct.

HMP 2019

Key issues identified by Ashley Built Heritage in the HIA assessment include that the HIA should, but does not, identify compliance with these policies apart from general discussion about the need to preserve the main Memorial building 'in the round'.

In fact, the new glazed courtyard will impinge on the silhouette of the AWM from the Land Axis. It will be a major accretion and will hide the architectural qualities of the stepped form and cruciform plan and symmetry of the main Memorial that has intangible heritage values associated with the shrine function of the AWM. Anzac Hall will also not be conserved as required by policy:

***Conserve Manage and Interpret Anzac Hall.** Respect the important architectural qualities of Anzac Hall including its external architectural form and siting which is subservient and recessive in the landscape and to the main Memorial building. Manage future change to Anzac Hall that is sympathetic to the heritage values of the Memorial. (HMP 2019)*

Removal of the Anzac Hall and construction of the new Anzac Hall and the new glazed courtyard are noted as potential heritage impacts. While it is agreed that the removal of Anzac Hall is an impact, the nature of the impact, such as the loss of an award-winning highly contributory building within the AWM precinct is not stated and should be considered fully and in greater detail.

The HIA also completely fails to note the key impact from the glazed courtyard, that it will result in the loss of external views of the full form of the Memorial building that has both aesthetic/technical significance at the highest level but also has intangible values for the shrine aspects that it symbolizes. The new glazed addition butted up to the side wings will result in the loss of the external visibility of the semicircular apse form, as well as obscuring views of the dome and leaving the whole cruciform plan visually truncated. The ability to perceive the main memorial building 'in the round' within its landscape setting will be significantly impacted.

In contrast the existing aerobridge that connects Anzac Hall to the main memorial building was strongly supported by the National Capital Authority at the time of the building design and the final result ensured that an appreciation of the full three-dimensional form remained as well as the ability to perceive the main memorial building 'in the round'.

Other key concerns identified by Ashley Built Heritage are that:

- The whole of the main Memorial 'valued as a place of great beauty' by the Australian community will be damaged by the glazed addition.
- The scale and bulk of the glazed courtyard and its roof will have a significant impact such that the development of details and materials will not reduce that significant impact.

- The immediate experience of the memorial function upon arrival up the existing steps and views to the Courtyard and Hall of Memory and then also looking down the Anzac Parade will be fundamentally obscured and diminished by the new lower ground entrance and result in a significant impact.
- The engagement of specialists will not remove the significant impact of the glazed courtyard.
- In addition to the impacts of the glazed courtyard on the architectural and social values of the main Memorial building noted above, the visibility of the roof of the glazed courtyard in views towards AWM along Anzac Parade would be inconsistent with the values of the AWM and the Parliament House Vista.

DUE PROCESS CONCERNS

While the HIA included in the Referral generally identifies the likelihood of impacts associated with the project, it does not provide sufficient analysis of the specific nature and degree of impacts and does not appropriately address policy compliance. Issues associated with the processes of the redevelopment project are also identified:

- a Reference Design, that included the demolition of Anzac Hall, as a mandatory requirement in the architectural design competition, even though three other Preliminary Designs met the same floor space requirements but retained Anzac Hall;
- the public consultation for the redevelopment project has to date only related to early parts of functional brief development, rather than actual design concepts. It has also not included professional stakeholders such as the Institute or the Moral Rights holders of Anzac Hall; and
- the Referral is only for some parts of the Redevelopment when all aspects should have been included in the one public process. The heritage impacts from these 'non referred' parts of the redevelopment, such as changes to the Parade Ground, should have been included.

The Institute is extremely disappointed that not only did the Reference Design significantly constrain the usual creative competition design processes, it lost the opportunity to creatively explore further options identified in the Preliminary Design stage, which would have supported the retention of Anzac Hall.

As noted some parts of the redevelopment project have not been included in the *EPBC Act 1999* Referral and have in fact already been approved by the National Capital Authority (NCA). A Temporary Carpark located east of Poppy's café was approved by the NCA on 23 November 2019 on the basis that it was 'physically separate' to the redevelopment although the NCA have acknowledged it was part of the overall redevelopment project.

While it may have been technically feasible to apply for and receive approval for these works based on the costs involved, the total project should have been subject to a review process before any approval was given for related parts of the project and the associated expenditure of funds. The combined and cumulative impact on the National Heritage values of the AWM should be considered in detail.

Finally, there is significant and growing concern, not only from the Institute but from other professional bodies and the wider community about the Redevelopment Project. No approvals have been given by the NCA nor the Parliamentary Public Works Committee for the demolition of Anzac Hall.

There has been very limited transparency in the decision making process regarding this project and the Institute has seen no evidence that the demolition is required. Nor has there been an appropriate level of community consultation on options that include the retention of ANZAC Hall and in the view of the Institute this does not meet the requirements as stated in HMP 2011:

Policy 3.1:

Recognise the strong community attachment to the heritage values of the AWM through regular liaison on proposals affecting the future uses and development of the place.

Policy Action 3.1.1:

Consult broadly on proposals with the potential to impact on the heritage values and national cultural and symbolic significance of the AWM Campbell Precinct.

It is acknowledged that the Memorial is embarking on a series of public consultations around Australia over the next two months in response to requirements under the *EPBC Act 1999*. However, it would have been more useful to undertake this consultation process before the Referral. This would have more successfully met the consultation policy requirements under the HMP 2011 and allowed a much more broader consultation on the impact of the redevelopment project on the heritage values and national cultural and symbolic significance of the AWM Campbell Precinct.

IMPACT ON EASTERN PRECINCT

The Eastern Precinct by Johnson Pilton Walker also won the Institutes prestigious Sir Zelman Cowen Award for Public Architecture and Canberra Medallion in 2011 at the National Architecture Awards. The effort the Memorial took to develop the Eastern Precinct adjacent to the AWM main building was significant. The Memorial followed due process under the *EPBC Act 1999*, including review and approval by the Public Works Committee with the result being a HMP and site development plan that worked together with a collaborative and collegiate team to produce an award winning development that had very little impact on the AWM and which is still highly celebrated.

The Eastern Precinct Development integrated a range of landscape and architectural elements within a nationally significant heritage landscape, based on extensive consultation and planning. The result being that the cafe, forecourt and National Service Memorial Courtyard are sensitive in architectural conception, powerful in composition, delicate and precise in construction, refined and exquisite in their simplicity, and delightfully integrated into the immediate and greater landscape. The precinct is an exceptional work of architecture and urban design and something should not be undermined through insufficiently planned future development.

The already approved tree removal and car park development, along with the broader redevelopment project has the potential to significantly negatively impact on the heritage and architectural value of the entire site while undermining the Eastern Precinct Development. A new Research Centre 'shop front' in the Eastern Precinct, included in the overall AWM redevelopment, but not in this Referral, will also create crowding near this activity and further reduce the sense of separation of the main Memorial building in the landscape – one of its identified attributes.

The cumulative impact of all planned development must be considered in detail to ensure that the effort taken to prioritise heritage values, maximise eucalypt retention and minimise vegetation loss during earlier development projects is not lost through insufficient planning and appropriate oversight when undertaking future development.

FINAL RECOMMENDATION

The Institute has significant concerns about the process followed in relation to heritage considerations for the \$498.7 million Redevelopment Project and the extent to which the entire project has progressed without the relevant heritage approvals in place.

The Memorial has legislative obligations for the protection and conservation of the heritage values for all Australians. It is not apparent that the Memorial has liaised effectively or to the extent required for such a significant project or adequately assessed the proposal's cumulative impact on the site. Over development will lead to significant adverse loss of the qualities that make the AWM nationally significant. The independent review of the *EPBC Act 1999* referral undertaken by Ashley Built Heritage confirms that the current redevelopment proposal will do just this.

Ashley Built Heritage has found that given the unmediated and significant heritage impacts that remain as a result of the planned redevelopment project, the refusal of the Referral under the *EPBC Act 1999* would be justified,

It is recommended that the Referral be identified as a "Controlled Action" and that the Memorial be required to review and revise the scheme to identify prudent alternatives that would retain Anzac Hall, not proceed with glazed courtyard addition and revise the southern entry such that the current entry and that experience is retained while also providing improved accessible access.

After such changes the Referral should be resubmitted and considered via the *EPBC Act 1999* pathway that includes opportunities for substantive public review and comment given the national significance of the site. The Institute calls on the department to take this entirely appropriate course of action.

Yours sincerely



Leanne Hardwicke

General Manager Policy, Advocacy and Education