

HERITAGE REVIEW: AUSTRALIAN WAR MEMORIAL REDEVELOPMENT



Australian
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FOREWORD

The Australian Institute of Architects (the Institute) has held significant and ongoing concerns regarding the \$498.7 million Australian War Memorial (AWM) redevelopment project due to substantial threats to the heritage value of the site including the Eastern Precinct Development and the demolition of Anzac Hall, both of which have received the Institute's prestigious Sir Zelman Cowen Award as well as the Canberra Medallion.

The Institute is not opposed to redevelopment however it is essential that the National and Commonwealth heritage values and solemn purpose and nature of the AWM as a public memorial is foremost in all decision making processes.

The architecture community was dismayed when the announcement was made that the redevelopment would include the demolition of the less than 20 year old Anzac Hall. It seemed unbelievable that such a decision within the public realm would be announced without large scale community and stakeholder consultation including with the moral rights holders – the architects who designed this award-winning structure – and with the Australian Institute of Architects.

When the Institute learned that of the four redevelopment options that had been considered, behind closed doors, only one of them had involved the demolition of Anzac Hall, we became even more concerned. For a redevelopment of this scale a properly executed national architectural competition should have been conducted.

These significant concerns about heritage impacts, due process and transparency combined with limited public consultation on the project, led the Institute to commission Ashley Built Heritage to undertake this independent Heritage Review of the redevelopment proposal.

The Heritage Review has identified that the current redevelopment proposal has significant heritage impacts arising from the bulk, scale and location of the new work and has also identified failures in due process, limited public consultation and non-compliance with existing heritage management plans for the site, including those that require the retention, conservation and interpretation of Anzac Hall.

The bulk and visibility of the planned glazed courtyard addition will also result in a loss of the visibility of the AWM's architectural values and form associated with its deeper meaning as a shrine. The Memorial has legislative obligations for the protection and conservation of the heritage values of the site 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.

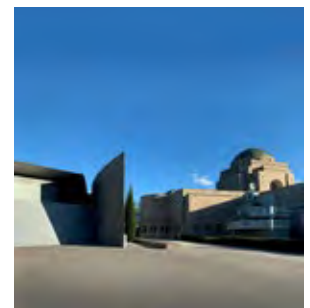
The significant concerns held by the Institute and its members about the redevelopment project have been confirmed by the Heritage Review. The Institute is therefore calling for the Memorial to safeguard the heritage values of the site by modifying the redevelopment plans.

In light of these issues, the Institute commends this Heritage Review undertaken by Ashley Built Heritage to you for detailed consideration.

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Cover image: View of the AWM with the original main Memorial building designed by Sodersten and Crust 1928 and constructed by 1941, right, and the Anzac Hall addition designed by Denton Corker Marshall 2001, left, with the bridge of the HMAS Brisbane adjacent to the main Memorial building. Photo Australian Institute of Architects November 2019

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EXECUTIVE SUMMARY

The Australian Institute of Architects (the Institute) engaged Geoff Ashley of Ashley Built Heritage to prepare this heritage review of a Referral to the Minister for the Environment by the Australian War Memorial (AWM), Canberra, pursuant to the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act).

The Referral covers some aspects of a proposed major redevelopment of the AWM, Campbell ACT, that was announced by the Prime Minister on 18 November 2019. The Referral covers the demolition of the Anzac Hall addition to the main Memorial building 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.

The main Memorial building was designed by Emil Sodersten and John Crust in 1928 and completed in 1941. The Anzac Hall addition was designed by the architectural firm Denton Corker Marshall and completed in 2001. The AWM is included on both the National and Commonwealth Heritage Lists (NHL and CHL). The NHL place includes the AWM and Anzac Parade, with the CHL place being the precinct at the northern end of Anzac Parade known as the AWM Campbell Precinct. The AWM is also part of the CHL Parliament House Vista that includes the AWM Anzac Parade and the Parliamentary Triangle south of Lake Burley Griffin.

The AWM is included on the Australian Institute of Architects' Register of Nationally Significant 20th Century Architecture with that listing also including Anzac Hall constructed in 2001 which received the Sir Zelman Cowan Award for Public Architecture in Australia in 2005.

The AWM and Anzac Parade together represent a landscape of great beauty and deep meaning for all Australians. The landscape has strongly connected aesthetic and social values associated with commemoration and remembrance. The construction of the main Memorial building was a direct consequence of the First World War; one of the seminal events in Australian history, and its cruciform plan and stepped massing surmounted by the dome expresses that history and its function as a shrine. The nature of commemoration is based in equal parts on the relationship between the building, the collections of objects and records and the commemorative spaces (CHL Rarity Criterion). The AWM also has national meaning associated with its urban setting that reflects the process of Australian parliamentary democracy at one end of Canberra's Land Axis with the AWM at the other end representing individual sacrifices made for that democracy.

This report identifies that the Referral project would have three significant adverse impacts. The first one would be from the bulk and visibility of the glazed courtyard addition to the Memorial that would result in a loss of the visibility of the Memorial's 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 the 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 of what currently is an immediate and profound experience of the memorial aspect.



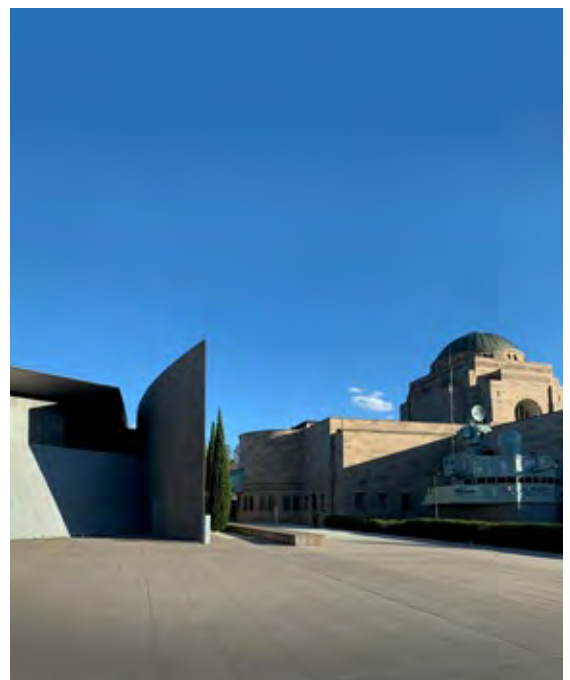
Other heritage impacts identified in this report include risks to the fabric of the Memorial for a new southern entrance and the change in overall AWM landscape character from all the proposed built forms and associated hard landscaping. The Referral does not comply with a number of the policies contained in Heritage Management Plans (HMPs) for the AWM, including in particular that both the 2011 and the 2019 HMPs require the retention, conservation and interpretation of Anzac Hall.

While the Heritage Impact Assessment (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 the aspect of policy compliance. This report also identifies issues associated with the processes of the redevelopment project:

- **a Reference Design** that included the demolition of Anzac Hall as a mandatory requirement in the brief for an architectural design competition, was selected over three other Preliminary Designs that met the same floor space requirement but retained Anzac Hall;
- **the public consultation** for the redevelopment project has to date only related to early parts of functional brief development – not actual design concepts and has not included professional stakeholders such as the Institute nor 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. There would also be heritage impacts from these ‘non referred’ parts of the redevelopment such as changes to the Parade Ground.

The HMP 2019 that is quoted extensively in the HIA as a final has not been endorsed via the EPBC Act process. At the same time the AWM is putting forward a proposal involving the demolition of Anzac Hall that does not comply with policy in the HMP 2019 that requires its retention. 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.

This report finds that given the significant heritage impacts identified the refusal of this Referral under the EPBC Act would be justified, however, given alternative options appear feasible, it is recommended that the Referral should be identified as a Controlled Action and that the AWM be required to review and revise the scheme to identify prudent alternatives that would retain Anzac Hall, not proceed with the 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 pathway that includes opportunities for substantive public review and comment given the national significance of this place.



1.0 INTRODUCTION

1.1 BACKGROUND

The Australian Institute of Architects engaged Ashley Built Heritage to prepare this heritage review of a Referral to the Minister for the Environment by the Australian War Memorial (AWM) pursuant to the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). The referral covers some, but not all, aspects of a proposed redevelopment of the Australian War Memorial, Campbell ACT, that was announced by the Prime Minister on 18 November 2019.

This review will form part of the Institute's submission in response to the Department of Environment and Energy (DEE) public exhibition period of the Referral.

The methodology followed in preparing this report, and reflected in the report structure, addresses: the heritage planning context, the redevelopment process, a review of the heritage impacts identified in the Referral documents and finally the author's assessment of key heritage impacts. This report is based on a review of the background listings and awards, the Referral documents, additional historical research and a site visit including a visit to the *Our Continuing Story* project exhibition.

In each of these sections the report focusses on those aspects that are most relevant to the assessment of this Referral.

1.2 SITE IDENTIFICATION

The Australian War Memorial is located at the northern end of Anzac Parade in the suburb of Campbell ACT, with its 14ha site bounded by Fairbairn Avenue, Limestone Avenue and Treloar Crescent.

The Australian War Memorial was designed in 1928 and completed in 1941 and is the result of an invited collaboration between Emil Sodersten, who is given primary credit for the external solidly massed form of the Inter-War Art Deco Style building with its Byzantine dome, together with John Crust who designed the internal cloistered memorial courtyard. Other site components include the Administration Building 1988, Anzac Hall 2001, the Parade Ground 2006, C E W Bean Building 2006 and Poppy's café 2011.

The Australian War Memorial is included on both the National and Commonwealth Heritage Lists (NHL and CHL). The NHL place includes the Australian War Memorial and Anzac Parade, with the CHL place being the precinct area noted above (and described as the AWM Campbell Precinct in the AWM Heritage Management Plan 2011). The AWM is also part of the Commonwealth Heritage Listed Parliament House Vista that includes the AWM and Anzac Parade and part of Lake Burley Griffin and the Parliamentary Triangle south of the Lake bounded by Commonwealth and Kings Avenues and Parkes Way.

The AWM is also included on the Australian Institute of Architects (the Institute) Register of Nationally Significant 20th Century Architecture with that listing also including Anzac Hall constructed in 2001 which received the Sir Zelman Cowan award for Public Architecture in Australia in 2005 and the Canberra Medallion awarded by the Institute's ACT Chapter in the same year. The Eastern Precinct Development by Johnson Pilton Walker was awarded the Sir Zelman Cowan Award in 2011 as well as the Canberra Medallion in the same year.

1.3 AUTHORSHIP AND ACKNOWLEDGEMENTS

This report was prepared by Geoff Ashley, Principal, Ashley Built Heritage. Geoff Ashley is a member of Australia ICOMOS and DOCOMOMO International and a built heritage specialist with degree qualifications in architecture. Geoff was a member of the GML Heritage Team that prepared the AWM Heritage Management Plan 2011 (HMP 2011) and has prepared heritage management plans for other CHL places in Canberra, including Lake Burley Griffin and the Old Parliament House Gardens Precinct. Photographs by Geoff Ashley unless noted.

Acknowledgement is made for the assistance of Liz Lang, Kathryn Hurford, Leanne Hardwicke and Philip Leeson of the Australian Institute of Architects.



1.1



1.2

Figure 11 The existing AWM entrance experience is simple and direct

Figure 12 Visitors have an immediate experience of the memorial aspects on entry

Figure 13 The cruciform plan and stepped elevation of the main Memorial building, with Anzac Hall on the left and the bridge of the HMAS Brisbane in the centre.

Figure 14 Anzac Hall viewed from the west



1.3



1.4



Figure 15 The pedestrian thoroughfare at west side of the AWM including the Sir John Monash sculpture with the stepped form of the main Memorial against the lower and darker Anzac Hall

Figure 16 View along the Land Axis from Tom Starcevic VC Park north of Treloar Cres towards Parliament House with the roof of Anzac Hall and the rear forms of the main building in the foreground

Figure 17 View of the AWM from the lookout on Mount Ainslie. Note white roof of Anzac Hall is visible it still allows the northern wall parapet of the main Memorial building to be visible.

Figure 18 The AWM viewed from part way down Anzac Parade



2.0 KEY HERITAGE VALUES AND POLICIES RELEVANT TO THIS REFERRAL

2.1 INTRODUCTION

This section provides an analysis of the identified heritage values and heritage management plan policies directly relevant to the Referral proposal. This section also addresses the heritage values and relevant policy for Anzac Hall.

Section 3 of this report addresses the design, consultation and development approval processes for the redevelopment. Section 4 addresses how the heritage impact assessment included in the Referral addresses these values and policy. Section 5 provides this report's assessment of impacts of the proposal against the identified values and policy.

2.2 AUSTRALIAN WAR MEMORIAL HERITAGE VALUES AND ATTRIBUTES

Both the National Heritage List (NHL) and Commonwealth Heritage List (CHL) demonstrate that the AWM meets the criteria for multiple values. The values identified in the National Heritage List (NHL) and Commonwealth Heritage List (CHL) are similar, although the Criterion F, Technical, is not met for the NHL. The CHL adds the attributes (both tangible and intangible) that demonstrate the identified values. As discussed below in Section 2.3 the HMP 2011 goes further and, as a link between values and policy, identifies the tolerance for change to the exteriors and the interiors of components of the place.

An analysis for this report of the listed values against NHL and CHL criteria has identified four groupings of the recognised heritage values that are considered to be directly relevant to an assessment of the heritage impacts for this Referral.

A LANDSCAPE OF BEAUTY AND CULTURAL MEANING FOR ALL AUSTRALIANS

The Australian War Memorial and Anzac Parade together represent a landscape of great beauty and deep meaning for all Australians. The landscape has strongly connected aesthetic values and intangible attributes of social values associated with remembrance and its function as a shrine.

The Australian War Memorial (AWM) is Australia's national shrine to those Australians who lost their lives and suffered as a result of war (NHL Summary Statement of Significance).

The AWM is the national war museum and national shrine, and together with Anzac Parade, has special associations for the Australian community, particularly veterans and their families (NHL Criterion G Social Value).

Also pivotal to the heritage value and cultural meaning of the place, are the social values of the AWM Campbell Precinct in its broader setting, which provides a site for the construction, maintenance and transformation of concepts of national identity—a place where individuals experience and reaffirm the link between individual and shared historic memory and the 'imagined community' of the nation (HMP 2011 Summary of Heritage Value).

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 (NHL Statement of Significance).

The building's design also successfully fulfils its special functions and reinforces the role of the place as a Shrine (CHL Criterion D.2).

FUNCTION OF THE AWM AS A MEMORIAL AND MUSEUM

The role of the AWM as a memorial, museum and an archive is a core aspect of its significance and rarity value (HMP 2019).

[C.E.W] Bean's vision of a war memorial as a place to house the objects made sacred by their direct association with the events and sacrifice of Australians at war was embodied in the establishment of the AWM (NHL Statement of Significance).

The Memorial building is a purpose-built repository where the nature of commemoration is based in equal parts in the relationship between the building, the collections of objects and records and the commemorative spaces. This is unique in Australia and believed rare in the world. (CHL Criterion B2 Rarity).

The equal relationship between the building, the collections of objects and records and the commemorative spaces (CHL Attribute Criterion B).

ARCHITECTURAL VALUES AND MEANING OF THE AWM

The design and construction of the main Memorial building was a direct consequence of the First World War, one of the seminal events in Australian history, and hence the ongoing importance of its cruciform plan and stepped massing surmounted by the dome that expresses that history and its function as a shrine. The importance of the main Memorial building's architectural form and character is emphasised in the 2019 version of the HMP.

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). (NHL Statement of Significance)

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). (CHL Criterion F1 Technical)

The main Memorial building is a stone faced War Memorial Museum in the Art Deco style which displays Byzantine modelling in its interpenetrating masses and a front entrance showing Egyptian influences in its pylons and massing. The features of the style displayed by the building include: a stepped skyline, concentration of ornament on the upper part of the building, tower feature and a monumental entrance. The building has a cruciform plan with two floors of galleries. (CHL Architectural design importance).

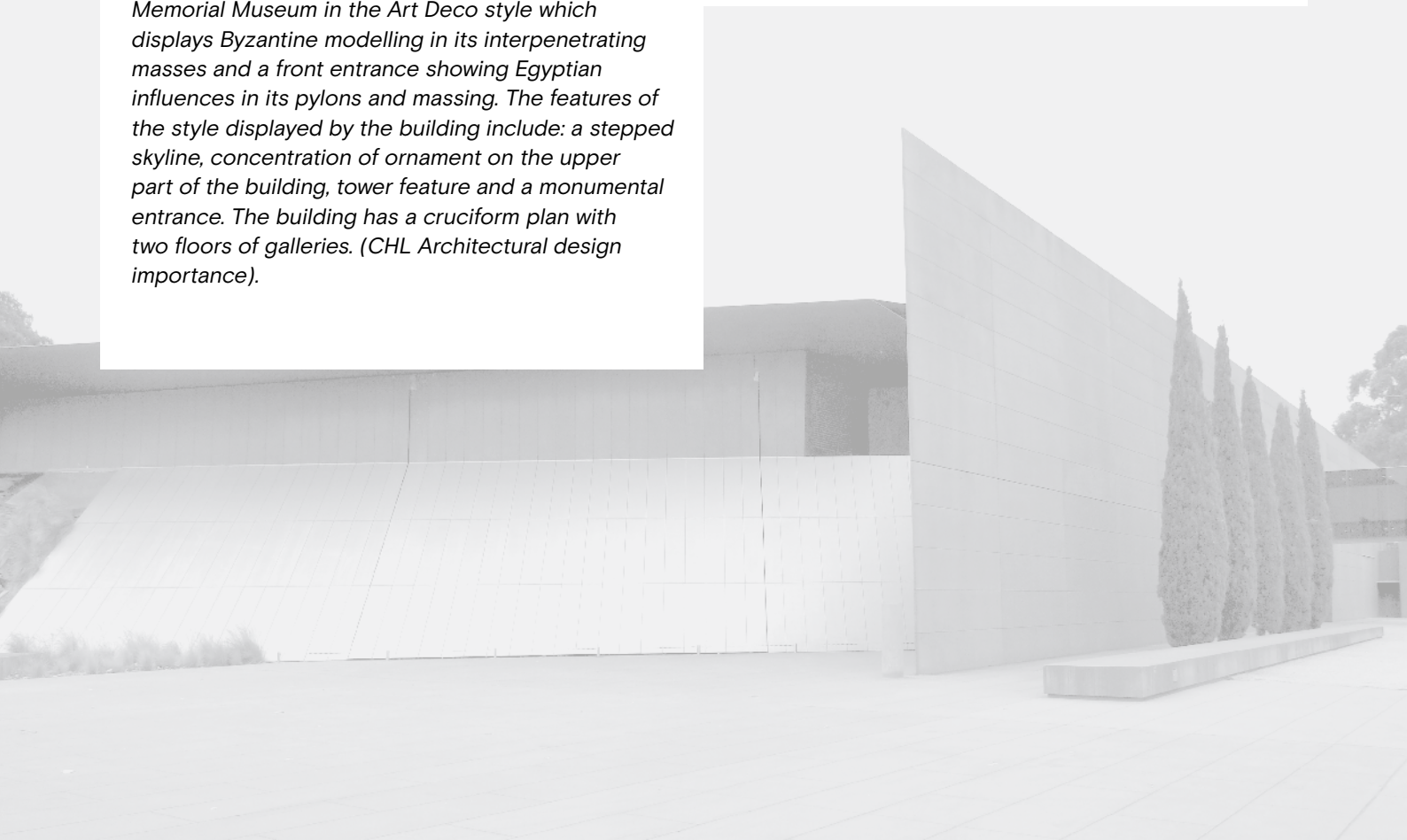
NATIONAL MEANING FROM THE AWM'S URBAN SETTING

The views to and from the Australian War Memorial are not only outstanding as a reflection of the Land Axis as a key aspect of the Griffin design for Canberra, but now have a deep cultural meaning that reflects the process of Australian parliamentary democracy at one end of that Land Axis with the Australian War Memorial at the other end representing the individual sacrifices made by members of that democracy.

The AWM together with Anzac Parade form an important national landmark that is highly valued by the Australian community (NHL Criterion E Aesthetic).

As the terminating building at the northern end of the land axis of Griffin's plan for Canberra, the AWM makes a major contribution to the principal views from both Parliament Houses and from Mount Ainslie (NHL Criterion E Aesthetic).

Views from Anzac Parade to the Hall of Memory, and from the Hall of Memory along the land axis are outstanding (NHL Criterion E Aesthetic).



2.3 HERITAGE POLICIES MOST RELEVANT TO THIS REFERRAL

A key aspect of Australia ICOMOS Burra Charter is that the management of heritage places should be based on their assessed heritage values. The EPBC Act Regulations 2000 require the development of Heritage Management Plans that include public consultation during their preparation as well as heritage impact assessment where change is proposed such as to avoid such impacts whenever possible.

Heritage attributes such as those included in the CHL entry for the AWM are the tangible and intangible aspects that demonstrate and provide evidence of its heritage values. The HMP prepared for the AWM in 2011 and another HMP prepared in 2019, but yet to be submitted for EPBC Act accreditation, both have included the concept of tolerance for change which is the extent to which key attributes of a component of the place are able to tolerate change without adversely affecting the nature or degree of their significance to the place overall (HMP 2011 Figure 3.1). For the AWM the HMPs 2011 and 2019 identify High, Medium and Low for component areas such as Low tolerance for change for the main Memorial building exterior (retained and conserved) and a Medium tolerance for change for the exterior of Anzac Hall (retained and conserved but may be altered to some degree without impact on significance).

As an overall policy objective, the HMP 2011 states that 'it has accepted the identified statutory heritage values of the AWM. The key objective of this conservation policy is to ensure the conservation, management and interpretation of these heritage values of the AWM Campbell Precinct in the context of its ongoing use, development and evolution as the place of the National Shrine, an integral part of the symbolic landscape of the National Capital, and one of Australia's most significant cultural sites'.

Below are the policies and policy actions in the HMP 2011 that are considered most relevant to the Referral assessment.

CONSERVATION PROCESSES

Policy 1.3: 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.

Policy Action 1.3.1: All planning or strategic documents or proposals with the potential to affect the AWM Campbell Precinct should refer to this HMP for primary guidance on the management of its heritage values.

Policy Action 1.11.1: 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.

Policy Action 1.12.1: Ensure that the symmetry of the existing building design in the landscape is respected in any proposals for change.

Policy Action 1.12.3: Avoid further accretions to the external fabric of the AWM main building.

Policy Action 1.12.4: If additions or changes are required to the external fabric/facade of the AWM main building ensure a rigorous process of heritage impact assessment is followed in developing appropriate designs and alternatives to mitigate impacts.

Policy Action 1.12.5: 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.

Policy Action 1.11.2: Ensure that any new development within the AWM Campbell Precinct does not impinge on the silhouette of the AWM as perceived from the land axis and that their height is less than the parapet of the AWM main building.

STAKEHOLDER ENGAGEMENT

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.

USE ACCESS AND SECURITY

Policy Action 7.3.1: Ensure that all security requirements and measures do not have an adverse impact on the heritage values of the AWM Campbell Precinct.

COMMEMORATIVE AREA POLICIES

The introduction to policy for this component notes that 'All visitors to the AWM Main Building enter through the Commemorative Area, providing a solemn introduction to the place as, not only a museum, but as the national mausoleum.

Policy Action 1.1.3: Converse and manage the symbolic arrival into the main building through the Commemorative Area and the experience of the grand vista of Griffin's land axis on arrival and departure.

Policy Action 1.1.4: Retain the views from the front arrival stairs to the Hall of Memory and back to Parliament House along the land axis.

HMP 2019 POLICIES

The HMP 2019 has not been included in the Referral documents and is not available on the AWM website. The Department of Environment and Energy has advised the Institute that the 'updated HMP' is yet to be submitted by the AWM to the Australian Heritage Council as part of the EPBC Act accreditation process.

From the review of the HIA undertaken for this report, it appears the following HMP 2011 policies are retained in the HMP 2019 (2011 reference in brackets):

- Symmetry respected in design changes (2011 –1.12.1);
- Avoid accretions (1.12.3);
- Perceive the building 'in the round' (1.12.5); and
- Retain and conserve Anzac Hall (see below).

HERITAGE STRATEGY

As required by the EPBC Act, the Australian War Memorial prepared a Heritage Strategy in 2008 and a Heritage Register in 2011. The AWM Heritage Strategy establishes the commitment of the AWM to ensuring that its corporate structures, responsibilities and funding allocations incorporate the objectives of heritage management. It also commits the AWM to ensuring heritage values are considered in forward planning processes. The Strategy includes a process for resolution of conflict arising from the assessment and management of Commonwealth Heritage Values (EPBC 7C1(d)) that includes 'Ensuring appropriate consultation occurs to allow relevant views and expertise to be taken into account in all decisions which have the potential to impact on the heritage values'.

2.4 HERITAGE VALUE AND POLICIES FOR ANZAC HALL

ANZAC HALL HERITAGE VALUE IN THE LISTINGS AND HMPS

The contribution made by the Anzac Hall 2001 is acknowledged in the NHL citation:

The design of a high curved wall of aerodynamic plan form some 20 metres behind the main building provided space and retained the view of the original building 'in the round', as originally intended by Sodersten and Crust. The hall sits unobtrusively behind the iconic main building. The fan shaped bulk of the building was excavated in the hillside, so that it would have the minimum impact on views from Anzac Parade, with a large curved metal roof fanning out from the centre point of a dome behind the wall. A simple steel/glass bridge link joins the existing building to the new hall. The stone, concrete, metal and glass of the new hall enable the new forms to 'meld' appropriately with the heritage values of the main building and its landscape setting.'

The HMP 2011 states that 'The addition [ANZAC Hall] was carefully designed by architects Denton Corker Marshall to sit comfortably within the immediate vicinity of the original building.'

As noted above, in the NHL under Criteria (e) Aesthetic Characteristics, Anzac Hall is included along with the main building for its role as a reminder of important events and people in Australia's history that triggers disturbing and poignant responses from the vast majority of visitors. Anzac Hall is also included in the major features identified on the CHL entry.

ANZAC HALL POLICY IN THE HMP 2011 AND HMP 2019

The HMP 2011 in its Galleries specific section contains the following policy for Anzac Hall:

Policy 1.11: Conserve, manage and interpret the ANZAC Hall as a part of the AWM main building.

Policy Action 1.11.1: Respect the important architectural qualities of the ANZAC Hall and manage future change to ensure it is in keeping with the design of ANZAC Hall and sympathetic to the heritage values of the AWM Campbell Precinct. If and when the opportunity arises, replace the roof with copper in a radiating pattern.

As noted above in Section 2.3 Anzac Hall is described in the HMP as displaying – limited or Medium Tolerance for change of the heritage values such that the architectural form/design, location and use of the place should continue to 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.

The 2019 HMP has retained the policy of retaining and conserving Anzac Hall:

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.

AWARD AND LISTING RELATIONSHIP

The Australian War Memorial is included on the Australian Institute of Architects' 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 (Architecture Australia 2005: 56-61). The award is noted in the Institute's 20th-Century Register noted above. 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.' Anzac Hall also received the Canberra Medallion in the same year.

There have been 39 recipients of the Sir Zelman Cowan Award – the first being the Canberra School of Art by Daryl Jackson Evan Walker Architects in 1981. A key aspect of this Award is that they are not only public buildings but are also located within public lands that often contain buildings of many different periods where the awarded building is recognised for its contribution to an existing heritage place or precinct such as in this case.

From this author's experience in assessing heritage places for listing there is a direct relationship between recognition by groups such as the Institute (and others such Engineers Australia) for the work of their peers and the eventual recognition of values by the broader community through heritage listing. Specific examples in the ACT of this process include John Andrews' Toad Hall and Callam Offices. The Canberra School of Art additions to the original Art Deco Canberra High School by Daryl Jackson were awarded the first Sir Zelman Cowan Award in 1981. Daryl Jackson's 1976 Canberra School of Music was included on the CHL in 2009 with the award a key part of the listing citation. Daryl Jackson was awarded the Institute's Gold Medal in 1987.

The AWM heritage listings already acknowledge the contribution of Anzac Hall (and its receipt of the Sir Zelman Cowan Award) and that along with the broader process and precedents of heritage recognition noted where peer recognition leads to broader community heritage recognition are together indicative that Anzac Hall should be viewed as a heritage item in its own right.

3.0 THE DESIGN, CONSULTATION AND DEVELOPMENT APPROVAL PROCESS

3.1 INTRODUCTION

This section addresses aspects of the AWM redevelopment process that may result in potential heritage impacts. These aspects are discussed in relation to the development of the Project Design (including a Reference Design used as the basis of a design competition); the staged nature of the overall redevelopment where only some parts of the redevelopment have been included in the EPBC Act Referral and the consultation process to date.

3.2 PROCESS LEADING TO REFERENCE DESIGN AND COMPETITION

Section 7 of the Heritage Impact Assessment report in the Referral provides good information on the process undertaken by the AWM in developing its plans, including a Preliminary Design Phase, a Reference Design Phase and the Project Design Development (including two concurrent design competitions for the southern entrance and a new Anzac Hall). The Preliminary Design Phase was based on an initial business case and a functional brief and resulted in four preliminary designs that met the functional brief requirement that included a large increase in exhibition areas. While three of these preliminary designs retained the existing Anzac Hall, all were based on an absolute fixed increase in exhibition area, such that no options have been subsequently considered for reducing heritage impacts by reducing exhibition areas.

Of the three Preliminary Designs that retained Anzac Hall one had new pavilions linked to it around Treloar Crescent (Preliminary Design B), one had a subterranean development (Preliminary Design C) (but still included a glazed area directly against the Memorial) and one added a new large pavilion and entry directly west of the AWM (Preliminary Design D).

While it appears that Preliminary Design B would have had the least direct built heritage impacts, it does not appear that heritage was weighted very highly overall in the brief and preliminary design phases, as the one scheme that did not retain Anzac Hall was chosen to become the Reference Design.

Compounding the selection at the end of the Preliminary Design Phase of the one option that removed Anzac Hall (primarily because of visitor accessibility in that option) was the fact that this then became the Reference Design that was required to be met in the design competition that followed, that is the demolition of Anzac Hall and construction of an atrium (now called Glazed Courtyard directly adjacent to the north end of the main Memorial building). It is understood that some architects refused to enter the competition on this basis, that some architects approached to be jurors did not agree to do so and that one unsuccessful competition entry kept the existing Anzac Hall.

It appears to this author that the key process issue here was not only that the Reference Design significantly constrained the usual creative competition design processes but actually lost the opportunity to creatively explore options or parts of the options that had already been identified in the Preliminary Design stage.

While it appears that there was a 'heritage advisor' included in the process, this failed to translate into 'heritage' as a core factor in the development of either the original Brief or the Reference Design. The clear express of policy in the HMP 2011 and 2019, which identify the heritage values and components, do not appear to have been weighted highly enough. In an Open Letter to the AWM Council and Australian Government from the Institute's Gold Medal Award winners in April 2019 they stated that 'It is incomprehensible that in planning what would otherwise be such a welcome extension to the War Memorial so little regard has been shown for the cultural significance of Anzac Hall which is a national landmark and much-loved exhibition space.'

Compounding the concerns already expressed in the community the project was recently publicly announced by the Prime Minister on 18 November 2019. The outgoing Director of the War Memorial Brendan Nelson has stated that 'the train has left the station' when asked about whether the project will proceed (Steve Gower SMH 21 November 2019). The Institute's ACT Chapter wrote to the DEE expressing concerns about due process including that the AWM presents the proposal as already approved by the Government.

3.3 CONSULTATION

It is acknowledged that the AWM has undertaken consultation and indeed engaged consultation consultants, however it is the author's view based on the available documentation that it has been poorly staged and targeted.

It appears that the consultation undertaken by the AWM was based primarily on supporting its functional brief rather than consulting on design options (such as potentially in the Preliminary Design Phase). While it appears that the AWM has consulted with the community to the extent required in its HMP it is suggested that the HMP and AWM process should have included stakeholder groups representing professionals such as the Institute, the National Trust of Australia and Australia ICOMOS.

This community consultation was largely based on 'themes' relating to visitation as part of the functional brief development but there was no actual consultation on the proposal apart from later with the Department of Environment and Energy (DEE). This did not include consultation with relevant professional groups such as the Institute. It is acknowledged that AWM is embarking on a series of twenty public consultations around Australia over the next two months in response to requirements under the EPBC Act. However, it may be more useful to undertake this before the Referral as the basis of considering whether to proceed.

The Referral HIA identifies that in terms of moral rights (pursuant to the Copyright Act) that consultation should occur with the architects of Anzac Hall, Denton Corker Marshall. However, it is unclear whether or not that consultation has occurred. It seems surprising that such consultation did not occur earlier in this project. AWM undertook such consultation with the designers of the Eastern Precinct over recent development and as a result of that consultation made modifications to the design.

3.4 FULL REDEVELOPMENT NOT INCLUDED IN EPBC ACT REFERRAL

Some parts of the redevelopment project have not been included in the EPBC Act Referral and have in fact already been approved by the NCA. A Temporary Carpark located east of Poppy's café was approved by the National Capital Authority (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. This is a disconcerting process – while it may have been technically feasible to apply for and receive approval for these works based on the costs involved, it would seem that the total project should be subject to a review process before approval is given for related parts of the project and the associated expenditure of funds.

The Institute wrote to the AWM in October 2019 about this matter as well as concerns about the redevelopment generally, including the demolition of the Anzac Hall, what it saw as a lack of transparency in the process, and lack of community consultation on any redevelopment option (see above in relation to process and consultation).



4.0 REVIEW OF REFERRAL DOCUMENTATION

4.1 INTRODUCTION

This section provides a review of the documents for the EPBC Act Referral 2019-8574 (the Referral) available via the DEE Referral portal.

The Referral documents consist of the EPBC Act DEE Referral Form (Referral Form) and nine attachments. This section reviews in detail the three documents that relate most directly to potential heritage impacts: the Referral Form (4.3); Attachment E Heritage Impact Assessment (HIA) Vols 1 & 2 (4.4) and Attachment F Mitigation Measures (4.5). Comment relating to heritage aspects of the other seven Referral Attachments is included below in Section 4.2

4.2 REFERRAL ATTACHMENTS A, B, C, D, G, H & I

Attachments A & B. Attachment A shows the action area that is the whole of AWM Campbell Precinct. Attachment B shows that within that action area there are northern and southern 'disturbance' areas associated with the works with an area of 'avoidance' over the remainder of the AWM Campbell Precinct;

Attachment C is a consultation summary with Government and Indigenous organisations. It indicates that some consultation with the Historic Heritage Section of DEE occurred in relation to a Reference Design HIA and a site meeting to discuss the Project Design and Referral. A firm of heritage consultants was engaged to provide a peer review of a Heritage Strategy in December 2018 and also to discuss the Project Design in September 2019.

Attachment D is a Stakeholder Engagement and Consultation Report that was completed as part of the Detailed Business Case and therefore before the Reference Design. It used multiple survey techniques using five consultation themes. It is noted that in terms of redevelopment, respondents mostly identified that any redevelopment footprint should excavate rather than construct new in the precinct but that any additional building be added behind the Memorial to avoid impact on the front view. A minor feedback category was against redevelopment, although heritage impact was not identified as a reason. Respondents representing a non-military and non-Government organisation included the strongest 'against redevelopment'.

Attachments G, H and I were ACT guidelines for the preparation of an Environment Management Plan, the AWM's Energy and Environmental Plan and the AWM National Collections Environmental Management Plan.

4.3 EPBC ACT REFERRAL FORM

The Referral Form provides the project rationale. The project was developed and approved by the AWM Council on the basis that:

Such expansion is necessary in order for the Memorial to continue to meet its functions as described Section 5 of the AWM Act. While conscious of the impacts of the Project, it was considered that the impact on veterans and their families of not properly telling the stories of more recent conflicts and operations was significantly higher.

It is the view of Council that, despite the loss of physical heritage fabric as a result of the removal of the existing Anzac Hall, the Project would enhance the Memorial's heritage values in both the immediate and long term future by enabling the Memorial to continue to remain relevant in Australia's continuing national story.

The rationale to remove Anzac Hall came also from the Initial Business Case (IBC) that identified additional required space. However, as discussed in Section 3.2 three of the four options identified in the Preliminary Design phase did not require the removal of the existing Anzac Hall and still presumably meet the additional space requirements, if not the ease of accessibility for visitors that was part of the Reference Design decision.

Heritage impacts are addressed at four places within the AWM Campbell Precinct: New Southern Entrance; Anzac Hall; Glazed Courtyard and Parliament House Vista. In the HIA (see Section 4.4) the impacts on Anzac Hall and the Courtyard are addressed together and the Parliament House Vista is addressed as Views and Vistas. As both the Referral Form and HIA address the heritage impacts, to avoid repetition, this report provides an analysis of these below in Section 4.3 on the HIA.

The Referral Form uses the removal of Anzac Hall as a 'trigger' of significant impact under the Significant Impact Guidelines 1.2 because it is referred to the NHL and CHL listings. However, the Referral also states that 'there will be changes to the setting and landscape of the Memorial as a result of the new Anzac Hall' that are also cited as a trigger for referral.

4.4 REFERRAL HERITAGE IMPACT ASSESSMENT

The overall methodology used in the HIA report is considered generally to be reasonable and follows accepted practice, such as addressing comparative analysis of similar places and using the identified heritage values although it does not specifically identify noncompliance of the proposal with the policies in the HMPs 2011 and 2109.

Both the Referral Form and the HIA make reference to the EPBC Act Significant Impact Guideline documents: Significant Impact Guidelines 1.1 – matters of national environmental significance (including NHL places) and Significant Impact Guidelines 1.2 in relation to CHL places.

Given the extensive involvement of the consulting firm GHD in virtually all aspects over the length of the project it would have been helpful if the authors of the specialist heritage reports such as the HIA and their background were identified.

The table below contains an outline summary of the heritage impacts identified for the two work areas and views and vistas in the Referral Attachment E HIA, together with an analysis by this report of that impact identification and policy compliance with HMPs 2011 and 2019. Section 4.6 of this report identifies issues of process with the Referral documents.

REFERRAL HIA ASSESSMENT	ASSESSMENT IN THIS REPORT
8.1.1 NEW SOUTHERN ENTRANCE	
<p>Summary p128</p> <p>New southern entrance built below existing forecourt requiring temporary removal of some south elevation fabric including stairs, podium stone paving and underpinning the façade to provide connection between new entry and original building.</p> <p>Brief reference that changes will be made to 2006 Parade Ground in relation to the southern entrance but no reference to changes to the Parade Ground area and shape.</p>	<p>This area is noted as having Low tolerance for change in the HMP 2011 so some discussion of the specifics of change should have been provided to show that the Low tolerance for change could be met in doing the works.</p> <p>The AWM website Our Plans section identifies an enlargement of the existing Parade Ground and a change in shape. The fact that this aspect is not included in the Referral but is part of the advertised AWM redevelopment is of concern – especially if the same argument is used to not include in this EPBC Act process the temporary carpark recently approved by the NCA – see Process Section 4.6 for more details.</p> <p>In addition to changes mooted for the Parade Ground but not included in this referral, there is an overall expansion of hard stand and built area proposed in the AWM Precinct generally and a loss of trees that contribute to the landscape and memorial character.</p>
<p>HMP 2011 Policy and Actions p128</p> <p>The Policy and Actions in the HMP are provided but without comment in relation to the Referral proposal.</p>	<p>The HMP policies and actions should have been accompanied by an identification of the compliance of the proposal with policy.</p>
<p>HMP 2019 Policy and Actions p128</p> <p>As above.</p>	<p>As above in regard to compliance with policy.</p> <p>There is reference to a AWM Site Development Plan Review 2017 but no details are provided in any Referral document about this SDP.</p>

REFERRAL HIA ASSESSMENT	ASSESSMENT IN THIS REPORT
<p>Proposed works p129</p> <p>Introduction of a subterranean entrance in response to limitations of the existing entrance – to facilitate security screening cloaking and improved DDA access.</p>	<p>Reference to ‘modification’ of the main Memorial building’s lower southern elevation is of concern unless it is exactly the above temporary removal and replacement as noted in the summary.</p>
<p>Proposed works p130</p> <p>Both the new southern entrance and existing entrance will remain functional however the ‘majority of visitors’ will use the new entrance. The change of original sense of arrival is noted as an impact – see below.</p>	<p>Reference, below, is that the original stairs will only be used for ceremonial occasions not visitors.</p> <p>This change in access will result in a significant change and impact in the nature of the entry experience for visitors that is currently one of both simplicity and immediacy in relation to experiencing the memorial aspects of the Commemorative area and views to the Hall of Memory. The new entry experience will now be more that of entry to a museum, described in the HIA as ‘museum visitor arrival’ with cloaking, security and a theatre.</p>
<p>Proposed works p130</p> <p>Removal of a number of trees is noted but according to HMP they do not have historic value (although the Queen’s tree 1954 replanted a number of times would appear to be continuing to honor that event).</p>	<p>The specific risks and strategies associated with underpinning/shoring up to create an entry below the southern wall of the main Memorial building should have been described in the report – that work will have an impact.</p>
<p>Comment p130 Para 3</p> <p>There is reference to the current entrance being the ‘ceremonial entrance’ that would be used in future for ceremonial events with the majority of visitors using the new southern entrance.</p>	<p>The reference to ‘ceremonial entrance’ as existing is not correct or misleading. While it is used for ceremonies it is inappropriate that the current entrance be referred to only in that manner.</p>
<p>Potential Heritage Impacts p130</p> <p>Risk to structural integrity of the main original façade.</p> <p>Removal reinstatement of original stairs steps and paving.</p> <p>Removal of some internal fabric for the upgrade.</p> <p>Perceived change of visitor arrival to the main Memorial building.</p>	<p>The four dot points of impacts do not properly address the nature and degree of the impacts. The impact of the changed entry experience will be far greater than noted and will fundamentally change the experience that includes an immediate and intense experience of the memorial aspects of the AWM with views of Commemorative area and the Hall of Memory beyond and also looking back down Anzac Parade – this experience will now be delayed or potentially missed altogether.</p>
<p>Recommended Mitigation p131</p> <p>Inspection by a structural engineer of underpinning works to the main southern façade prior to bulk excavation works commencing.</p>	<p>This is a high risk and critical aspect of the proposal and reference to a specific limited role for a structural engineer is of concern – this critical work requires direct involvement of an engineer with high level heritage experience in detailed design and preparation and approval of risk avoidance strategies and regular inspections of the works themselves – see above re p130 para 2.</p>

8.1.2 ANZAC HALL AND GLAZED COURTYARD**Summary p132**

The project design would remove the Anzac Hall addition to the AWM, construct a new Anzac Hall and create a glazed courtyard between the new Anzac Hall and the main Memorial building.

The HMPs 2011 and 2019 both have policy recommending retention of Anzac Hall and only Medium tolerance for change for its exterior (HMP 2011).

The HIA claims that the existing aerobridge connection to Anzac Hall impedes views 'in the round' of the main Memorial.

The existing aerobridge does not impact the 'in the round aspect' as nearly as much as the proposal will – while there will be internal visibility from the proposal, the ability to appreciate externally the cruciform form of the Memorial with its intangible associations as a sacred memorial will be lost.

What was described as an 'atrium' in Preliminary schemes is now a 'courtyard' – the implication being that is not really the internal space that it will be – however it would be fully enclosed with glazing that is likely to be more reflective than shown, for example from direct western sun.

HMP 2011 p133

The most relevant policy includes: 1.11.2 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 Respect an ability to perceive the main Memorial 'in the round'

1.11: Conserve, manage and interpret the ANZAC Hall as a part of the AWM main building. 1.11.1 Respect the important architectural qualities of the ANZAC Hall and manage future change to ensure it is in keeping with the design of ANZAC Hall and sympathetic to the heritage values of the AWM Campbell Precinct.

The HIA should, but does not, identify compliance with these policies (apart from the 'in the round' discussion above).

The proposal does not comply with any of these policies:

- The new glazed courtyard is shown impinging on the silhouette of the AWM from the Land Axis;
- The ability to perceive the symmetry and cruciform form of the main Memorial will be lost as a result of the glazed courtyard; and
- The Anzac Hall will not be conserved as required by policy.

HMP 2019 p134

Policies of 2011 on symmetry, 'in the round', accretions and the architectural qualities of the main Memorial are still included in 2019.

The HIA should, but does not, identify compliance with these 2019 policies (apart from the 'in the round' discussion above).

The proposal does not comply with any of these policies. The glazed courtyard proposal would be a major accretion and would 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.

HMP 2019 p134

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.

The HIA should, but does not, identify compliance with this policy.

The proposal does not comply with this policy.

REFERRAL HIA ASSESSMENT	ASSESSMENT IN THIS REPORT
<p>Comments para 2 p135</p> <p>Discussion provided on a greatly increased area for exhibitions leading to the removal of the existing Anzac Hall as being the ‘least negative’ impact on heritage values.</p>	<p>This report does not agree with that assessment based on a review of the four Preliminary Options considered – Preliminary Design B would have provided this area without the impacts.</p>
<p>Comments para 3 p135</p> <p>The process of what led to the existing Anzac Hall is used to justify the current proposal to remove the existing Anzac Hall.</p>	<p>An illogical argument is made citing the process that led to the existing Anzac Hall to claim that a new Anzac Hall would result in the same positive outcome.</p>
<p>Comment para 3 p136</p> <p>Further consultation will be required with the architects of Anzac Hall DCM regarding moral rights.</p>	<p>It is understood that the AWM have written to DCM in regard to this moral rights issue in the required manner – see Section 4.6.</p>
<p>Comment para 4 p136</p> <p>Both HMPs state that Anzac Hall should be ‘ideally’ retained.</p>	<p>Not correct – neither HMPs use the phrase ‘ideally’ in relation to the retention of Anzac Hall – both are presented in an unequivocal manner.</p>
<p>Potential Heritage Impacts p136</p> <p>Removal of the Anzac Hall and construction of the new Anzac Hall and the new glazed courtyard are noted as potential heritage impacts.</p>	<p>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 have been.</p> <p>While it is partly covered in views and vistas, below, the dot point list of impacts completely fails to note the key impact from the glazed courtyard – the loss of external views of the full form of the Memorial building (Fig 1.3) 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.</p>
<p>Potential Heritage Impacts p136</p> <p>Four other potential impacts on fabric are identified regarding removal stone for waterproofing, roof fabric for support, structural risk re uplift and different degrees of stone fading.</p>	<p>These physical impacts are agreed as potential impacts.</p>

REFERRAL HIA ASSESSMENT	ASSESSMENT IN THIS REPORT
8.1.3 VIEWS & VISTAS	
<p>Summary para 1 p138</p> <p>The visually symbolic link between the AWM and Parliament House is explained.</p>	<p>This report also makes the same point in Section 2.2 of the symbolic link between parliamentary democracy represented by Parliament House at one end of the PH Vista and the sacrifice of individuals made to support that democracy represented by the AWM at the other.</p>
<p>HMP 2011 and HMP 2019 p139</p> <p>Ensure the ability to perceive the main memorial building 'in the round' within its landscape setting is not compromised by any new surrounding development or impact on significant views to the building.</p>	<p>Compliance with policy not identified – it does not comply.</p> <p>The glazed courtyard will destroy views of the semi-circular apse form of the Memorial and sense of cruciform shape and associated shrine aspects – see Figures 50 and 51 in the HIA.</p>
<p>Potential Heritage Impacts p140 dot pt 1</p> <p>The new southern entrance and a small part of the glazed courtyard will be visible from Anzac Parade and the PH Vista.</p>	<p>The new courtyard roof will be visible along Anzac Parade and the PH Vista – see Figures 42 and 43 in the HIA – this is non-compliant with policy and will be a significant, not minor impact. While not altering the 'axial layout' (ie plan) it will be visible in the elevation of the AWM.</p>
<p>Potential Heritage Impacts p140 dot pt 2</p> <p>The nexus element will be visible along the PH Vista but will not be an impact.</p>	<p>It is agreed that although visible the nexus component of the new southern entrance would not impact the PH Vista.</p>
<p>Potential Heritage Impacts p140 dot pt 3</p> <p>The glazed courtyard will be visible and alter the PH Vista from Mount Ainslie but is described as a minor change.</p>	<p>The main Memorial would lose the visibility of its cruciform form that is visible above the existing Anzac Hall when viewed from Mt Ainslie – see Figure 1.7. This will be a heritage impact.</p>
<p>Potential Heritage Impacts p140 dot pt 4</p> <p>New Anzac Hall and glazed courtyard may potentially obscure part of the northern elevation of the main Memorial building'.</p>	<p>These additions <u>will obscure</u> the northern elevation of the main Memorial building and result in a significant heritage impact on its architectural and intangible values, as noted above.</p>
<p>Potential Heritage Impacts dot pt 4 p141</p> <p>Continuation of the above dot point stating that changes to the aerobridge will improve 'in the round' perception of the building and while there will be changes in views to the main Memorial building these are in keeping with its landscape setting and architectural values.</p>	<p>The existing aerobridge does not reduce an ability to perceive the building in the round and conversely change to the views of the main Memorial building from the glazed addition will greatly impact the landscape setting of the Memorial and its architectural values.</p>
<p>Recommended Mitigation p146 dot pt 2</p> <p>Glazed courtyard remains below <u>or minimises</u> the structure above the main Memorial parapet roofline.</p>	<p>This is a very weak recommendation and allows for the courtyard roof form to remain above the parapet as it currently is and shown to be visible along the PH Vista.</p>

4.0 REVIEW OF REFERRAL DOCUMENTATION

The table below identifies the NHL Significant Impact Criteria 1.1 and CHL Significant Impact Guideline Criteria 1.2, the response provided in the Referral HIA and the response of this report.

SUMMARY OF NHL AND CHL IMPACT GUIDELINES HIA RESPONSE (Table 11 p156 and Table 12 p160)	RESPONSE OF THIS REPORT
NHL SIGNIFICANT IMPACT CRITERIA 1.1	
<p>Will values be lost?</p> <p>The removal of Anzac Hall will be a significant impact because it is cited as a feature in the NHL listing. HIA claims that no other values will be lost.</p>	<p>Unlike the CHL, the NHL does not identify the attributes of heritage values such that reference in the citation to a feature such as Anzac Hall is sufficient to trigger that assessment. The removal of Anzac Hall will result in a loss of values and as below the AWM will be damaged, diminished and obscured by aspects of the proposal.</p>
<p>Values degraded or damaged?</p> <p>The HIA notes fabric changes to main Memorial and the glazed courtyard but says that with proper actions during construction that there will be no degrading or damage to NHL values.</p>	<p>The whole of the main Memorial ‘valued as a place of great beauty’ by the Australian community will be damaged by the glazed addition.</p>
<p>Values obscured, diminished, modified or altered?</p> <p>Provided developing the scheme further engages appropriate specialists the new glazed courtyard is not considered a significant impact.</p>	<p>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.</p> <p>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.</p>
<p>Remove, destroy damage or substantially alter fabric of an NHL place?</p> <p>Removal of Anzac Hall likely to be a significant impact. The removal or altering of fabric associated with the southern entry and glazed courtyard with detail and engagement of specialists not considered inconsistent with values.</p>	<p>The removal of Anzac Hall, a highly contributory component of the AWM Campbell Precinct will be a significant impact.</p> <p>It is agreed that with the engagement of relevant specialists that the altering of fabric for the works at the southern entrance and glazed courtyard would not be inconsistent with values, although the change in entry experience and the glazing aspects themselves will be inconsistent with values.</p>
<p>Extend, renovate, refurbish or substantially alter not consistent with values?</p> <p>Removal of Anzac Hall as above. Response repeats the above response on removal of fabric.</p>	<p>Not noted in the HIA response is the glazed courtyard extension to the main Memorial building that is not consistent with the values (NHL aesthetic value (e)).</p> <p>The substantial alteration of the existing entrance that will have a fundamental change the experience of an immediate exposure to the memorial aspects of the place would not be consistent with values.</p>

SUMMARY OF NHL AND CHL IMPACT GUIDELINES HIA RESPONSE (Table 11 p156 and Table 12 p160)	RESPONSE OF THIS REPORT
<p>Construction of buildings within or adjacent to an National place inconsistent with values?</p> <p>The construction of the new Anzac Hall and glazed courtyard within the nationally significant view lines is acknowledged and so is the fact that the proposed glazed courtyard will have some impacts to the ability to view the northern elevations of the main Memorial building. The southern entry and a small part of the glazed courtyard will alter the main Memorial building's landscape setting but are considered minor and will not alter the building prominence or its landscape setting against Mount Ainslie.</p>	<p>The engagement of specialists will not remove the significant impact of the glazed courtyard.</p> <p>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.</p>
<p>Changes to the landscape setting of a National Place.</p> <p>The response identifies the respectful design of the new Anzac Hall to the setting and engagement of specialists in the next stages of the project.</p>	<p>Overall the redevelopment project would substantially change the overall character of the AWM Precinct with not only the increase in the footprint of built elements, but also hardening of the total landscape including the increased area of the Parade Ground as well as the removal of Australian tree species that provide a softening and foil to the formal aspects of the architecture.</p>
<p>Restrict or inhibit use as a cultural/ceremonial site causing values to diminish over time .</p> <p>Improved access for mobility especially for ceremonial occasions will be enhanced.</p>	<p>It is agreed that access will be improved to support cultural values, however the change in the arrival experience that currently provides an immediate contact the memorial cultural function will be impacted.</p>
<p>Will action diminish value for group?</p> <p>The HIA states that the shrine, museum and archive role would not be dismissed (diminished?) and will be enhanced through additional floor space.</p>	<p>Both the changes to the southern entry experience and the changes resulting from the glazed courtyard will impact the shrine role of the AWM.</p>
<p>Will diminish technical or creative achievement?</p> <p>The Sir Zelman Coward award for Anzac Hall and its proposed removal is acknowledged as a significant impact.</p>	<p>Agreed.</p>

SUMMARY OF NHL AND CHL IMPACT GUIDELINES HIA RESPONSE (Table 11 p156 and Table 12 p160)	RESPONSE OF THIS REPORT
CHL SIGNIFICANT IMPAC CRITERIA 1.2	
<p>Remove destroy or alter fabric?</p> <p>It is noted that Anzac Hall is not a feature noted in CHL but recognised in HMP 2019 contributing to the CHL Technical Criterion (f).</p>	<p>This recognition is appropriate as Anzac Hall is a highly contributory award winning building that strongly supports the function of the AWM Campbell Precinct and its overall landscape setting.</p>
<p>Extension, renovation or substantial alteration not consistent with values?</p> <p>The demolition of Anzac Hall is acknowledged.</p>	<p>The extension of the main Memorial being the glazed courtyard is a substantial alteration and one not consistent with the CHL values.</p>
<p>Erection of building adjacent to inconsistent with heritage values?</p> <p>The glazed courtyard will have some impact on ability to view the northern elevation of the main Memorial buildings, including from Mount Ainslie.</p> <p>Also acknowledgement of the visibility of this roof from new southern entrance.</p>	<p>The glazed courtyard will impact the identified qualities and appreciation of the main Memorial building and will alter the visibility of its northern elevation from Mount Ainslie and the courtyard roof will be visible along the Land Axis and Anzac Parade which is unacceptable and not consistent with the identified values.</p>
<p>Community social values diminished?</p> <p>The project will ensure the longevity of the Memorial and improve visitor interaction. A 'broad range of community groups' were consulted.</p>	<p>While the consultation undertaken is acknowledged in developing the Detailed Business Case for the project that aims to improve visitor interaction, the whole Australian community will be impacted by the change in the arrival and impacts of the glazed courtyard in relation to the memorial role of the AWM.</p>
<p>Alter the setting inconsistent with heritage values?</p> <p>The new build of Anzac Hall is considered respectful of this setting so changes are considered minor and do not substantially alter the prominence of the main Memorial building in its landscape setting against Mount Ainslie.</p>	<p>The new Anzac Hall and glazed courtyard will alter the prominence of the main Memorial building.</p> <p>Overall the redevelopment would change the overall character of the AWM Precinct with an increase in the footprint of built elements and also hardening of the total landscape, including the increased area of the Parade Ground as well as the removal of Australian tree species that provide a softening and foil to the formal aspects of the architecture.</p>
<p>Use of cultural site?</p> <p>The proposed works will improve access to the place, particularly mobility impaired access.</p>	<p>Agreed.</p>

4.5 REFERRAL ATTACHMENT F: MITIGATION MEASURES

The following comments are made on the Mitigation Measures 1 to 5. Comment is not considered necessary at this stage on Mitigation Measures 6 to 12 inclusive. Design Guidance 12 is discussed in this report's assessment of heritage impacts relating to the glazed Courtyard roof element.

Mitigation Measure 1 – *Engage an architect(s) with suitable experience and qualifications to undertake further detailed design guided by the National and Commonwealth heritage values of the Memorial and the Parliament House Vista.*

The 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. Work on the southern entrance aspect that continued to provide the current direct staircase entry to the AWM for visitors as well as for ceremonies, as well as providing a more accessible entry as described in the proposal should be feasible.

Mitigation Measure 2 – *Retain and enhance the National and Commonwealth heritage values of the Memorial and Parliament House Vista through continued excellence in design.*

Excellence in design is a good objective, however as above, if the heritage impacts that are significant arising from the bulk, scale and location of the new glazed courtyard work involving design excellence will not remove these impacts.

Mitigation Measure 3 – *Retain and enhance the landscape setting and built environment of the Memorial through the use of high quality materials that are sympathetic to the existing built fabric of the Memorial.*

More appropriate, or perhaps in addition to, high quality materials will be to work with a landscape design specialist to continue the aspects of informal landscape that creates a contrast in character with the formal built elements.

Mitigation Measure 4 – *Implement a robust peer review design check process to evaluate changes in design against the National and Commonwealth heritage values of the Memorial and the Parliament House Vista, and provide expert advice to retain and enhance these values.*

As a first priority engage design and heritage specialists of experience to advise on fundamental changes to the project to remove the impacts identified in this report.

Mitigation Measure 5 – *During construction, excavation will not occur within a two metre heritage protection zone along the interface of the main Memorial building front façade. Further a commitment to monitor potential structural movement and vibrations during construction work at the main Memorial building and develop contingencies in the case of potential structural impacts.*

This two metre boundary appears arbitrary unless it has resulted from specific design advice and may not in fact be possible in the location where the new entry passes under the main Memorial building southern façade.

4.6 PROCESS ISSUES ASSOCIATED WITH THE REFERRAL DOCUMENTS

Referral versus Redevelopment Project Scope

An important processes issue is that the works that form the EPBC referral are only part of the overall AWM's redevelopment project, when all aspects of the redevelopment should be included in the one process that includes public scrutiny and review given the national significance of the place. Examples of this process issue include the temporary carpark, the extension of Poppy's carpark and changes to the Parade Ground.

In a similar way to the issue of the recent NCA approval of the temporary carpark that was acknowledged as being part of the overall redevelopment project but not considered necessary for inclusion in this EPBC referral, the AWM plans for changes to the Parade Ground are referred to on the AWM website and appear to be included in the 'artists impression' view looking towards the AWM in the HIA (p96) – essentially removing the grass area closer to the top of Anzac Parade and the splayed gravel paths that connect it both literally and in a design sense to Anzac Parade. However, neither the Referral Form or this HIA includes those changes in a description and assessment of the referral.

Status and availability of relevant documents

There are some reports that could have been relevant to an assessment of impacts that are referred to in the HIA but not available either via the referral portal or the AWM website, these include: the AWM Site Development Plan by Johnson Pilton Walker 2017 (HIA p8) that stated 'the main Memorial building should dominate as part of a simple landscape setting, and that any developments within the precinct should not challenge or detract from this building'

The status of key documents directly relevant to the Referral is also a concern. The HIA states that the final HMP 2019 by GML is expected to be accredited by the Minister for Environment 'by end of 2019' which implies that it is with the DEE when in fact it is understood in recent communication from DEE that it is still with AWM and will be submitted in early 2020. There is also reference in the HIA to a Heritage Strategy 2018 by GHD but this has not been quoted in the HIA and its status relative to an endorsed Heritage Strategy by GML 2011 is not defined.

Lack of Architectural Plans

A related issue is that an assessment of the Referral proposal is not assisted by the lack of scaled architectural plans to fully communicate the proposal and potential impacts, for example, the southern entrance aspect has inadequate plans to show the entry into the main Memorial building.

In all other areas of the public domain applicants are expected to provide scaled architectural plans sections and elevations in the most usual suburban DA so the lack of documentation provided in the referral is puzzling when clearly there are more plan documents not made available.

Impacts not identified specifically enough

The identification and evaluation of the impacts is too vague and generalised and while it is agreed to be enough to 'trigger' the referral based on the precautionary principal, it does not assist an assessment of the degree of impact or where potential alternative solution may lay. For example, the actual impacts of the removal of the Anzac Hall should have been noted, that is, the loss of an award winning building that makes a high degree of contribution as an infill building in a heritage setting as well as to the function of the place, while also being recessive to the original building.

Another example is the new southern entrance that describes the impact as 'change to original sense of visitor arrival' when the actual change of arrival experience will be from where the memorial aspects are immediate and profound to that of a 'museum visitor arrival experience' (HIA p130).

The HIA also is not clear enough between change and impact. While it is agreed that not all change is an impact there should have been greater clarity on what are impacts. For example, the HIA notes a change to the view from Mount Ainslie from the glazed addition but should have identified this as an impact.

Mitigation Measures

There is a constant reference to further design detail being developed by appropriate professionals when, in the opinion of this report, more detail in relation to such things as meeting points of the old and new and material selection, is not going to assist with high level 'gross scale' impacts of this proposal.

Design Mitigation 12 refers to the engagement of an architect to protect views and vistas so that the glazed courtyard 'remains below or minimises the structure above, the main Memorial building parapet roofline so that the structure is not visible along the Parliament House Vista'. Figure 43 in the HIA (p144) shows that the courtyard roof will be visible from Anzac Parade. It is of concern that this indicates the possibility that a 'sacrificial condition' is being set up such that this visibility is required to be removed while leaving the overall glazed courtyard and its impact intact.

Evaluation of impacts with reference to unrelated aspects

In some situations, the HIA provides a positive evaluation of a heritage impact using an aspect that bears no relation to the nature of the impact. An example is that in referring to the visibility of glazed courtyard from Anzac Parade there is reference to this not changing the axial arrangement of the Parliament House Vista which is irrelevant to that visibility and its impact.

Moral Rights

Design Guidance 16 included in the HIA states that 'concern has been expressed in relation to the project, potential demolition of Anzac Hall, and the moral rights of Denton Corker Marshall Architects with regard to Anzac Hall. If the project is to proceed, and Anzac Hall is to be demolished and rebuilt, the moral rights of Denton Corker Marshall Architects will need to be considered'.

This author contacted Denton Corker Marshall and they advised that their contract for the Anzac Hall project predated the Moral Rights legislation and that therefore there were no personal waivers to the infringement of Moral Rights nor a firm indemnity to the client in relation to Moral Rights in that contract. Denton Corker Marshall also advised the AWM that they believe that there are multiple Moral Rights holders involved in the Anzac Hall project and provided the AWM with a list of names that may or may not be exhaustive.

Denton Corker Marshall also advised that John Denton, one of the Moral Rights holders, has been contacted by the AWM in the required manner regarding the redevelopment and proposed demolition of Anzac Hall and has been offered the opportunity to consult with the AWM in good faith about the demolition of Anzac Hall (but not retention) and to record the building (as required by the legislation). John Denton has asserted his Moral Right in relation to the building. The response of other Moral Rights holders is unknown.



5.0 SUMMARY OF IMPACTS, CONCLUSIONS AND RECOMMENDATIONS

5.1 INTRODUCTION

This final section provides summaries from the preceding sections on key aspects relevant to the proposed redevelopment of the Australian War Memorial addressed in the EPBC Act Referral.

Firstly, the key heritage values relating to the development are identified, including the four groupings of values identified in Section 2.2 that are used to explain the key values and attributes relevant to assessing the impacts of the redevelopment. The key heritage policies based on these values included in Heritage Management Plans for the AWM are briefly described.

Secondly, the process issues described in Section 3 relating to the project development and consultation are noted, as well as the process issues that this report believes are associated with the Referral documents.

Finally, a summary of what this report considers to be the key heritage impacts and issues in the Referral are identified, as well as potential impacts not in the Referral but identified in plans by AWM as part of the overall redevelopment project.

An overall Conclusion is provided and then Recommendations to identify a way forward.

5.2 SUMMARY OF ISSUES — HERITAGE VALUES

Refer to Section 2.2 with four groupings that provides some of the recognised heritage values to highlight four key attributes and how this proposal may affect these attributes. The Conclusion in Section 5.6 indicates the impacts that the Referral will have on these values.

1. The Australian War Memorial and Anzac Parade together represent a landscape of great beauty and deep meaning of all Australians. The landscape has strongly connected aesthetic values and intangible attributes of social values associated with remembrance and its function as a shrine.
2. It is appreciated that 'the nature of commemoration is based in equal parts in the relationship between the building, the collections of objects and records and the commemorative spaces' (CHL Criterion B2 Rarity) and that the collections are a key vehicle for commemoration.
3. Architectural values and cultural meaning of the AWM. The design and construction of the main Memorial building was a direct consequence of the First World War, one of the seminal events in Australian history, and hence the ongoing importance of its cruciform plan and stepped massing surmounted by the dome that expresses that history and its function as a shrine.
4. National meaning from the AWM's urban setting. The views to and from the Australian War Memorial are not only outstanding as a reflection of the Land Axis as a key aspect of the Griffin design for Canberra, but now have a deep cultural meaning that reflects the process of Australian parliamentary democracy at one end of that Land Axis with the Australian War Memorial at the other end representing the individual sacrifices for that democracy.



5.3 SUMMARY OF ISSUES — POLICY

It is important to note that the HMPs prepared for the AWM (2011 and 2019) are a requirement of the EPBC Act and the policy contained in these documents should be complied with. The policies most relevant to this proposal are noted in Section 2.3 — including in particular Policy Action 1.3.1 in the HMP 2011 that states that ‘all proposals with the potential to affect the AWM Campbell Precinct, should refer to this HMP for primary guidance on the management of heritage values. As noted below in Section 5.4, the HIA is generally quiet about whether the policies have been complied with.

The assessment in this report of the referral documents, and included on the table in Section 4 show that the proposal, in the opinion of this report, does not comply with a substantial number of key policies in the HMP 2011.

Policy Action 1.11.1 (ensuring visual isolation), Policy Action 1.11.2 (development not to impinge on views from land axis), Policy Actions 1.12.1 and 1.12.5 (symmetry and visibility of cruciform form ‘in the round’) will not be complied with.

Policy Action Commemorative Area 1.1.3: ‘Conserve and manage the symbolic arrival into the main building through the Commemorative Area and the experience of the grand vista of Griffin’s land axis on arrival and departure’ will not be complied with in relation to the new southern entrance.

Policy and Policy Action in the HMP 2011 require the conservation management and interpretation of the existing Anzac Hall (Galleries 1.11) and the 2019 HMP has the same clear 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. The proposed demolition of Anzac Hall does not comply with these clearly expressed policies.

5.4 SUMMARY OF ISSUES — PROJECT AND DOCUMENTATION PROCESSES

PROJECT PROCESS ISSUES

There are three project process issues of particular concern: the process of project development; the consultation undertaken and that some aspects of total scope of the redevelopment project are not included in the Referral.

Process of project development. The project process has involved: developing business cases, functional briefs, preliminary designs, a reference design and the project design which is the subject of this Referral. As noted in Section 3.2, the requirement of a substantial increase in gallery area became an absolutely fixed requirement that resulted in the view expressed by the AWM Council that meeting that requirement resulted in a positive heritage outcome and the ‘least negative outcome’ in losing Anzac Hall and other acknowledged impacts. This was compounded by the Preliminary Design selection of four options, three of which retained the Anzac Hall; one of which (Preliminary Design B) did so and also did not require a glazed courtyard. The one Preliminary Design option that removed Anzac Hall appears to have been selected on the basis of reducing visitor travel.

A key process issue here is that this option then became the Reference Design that the following architectural competition was required to meet this not only significantly constrained the usual creative competition design processes, but actually lost the opportunity to creatively explore options or parts of the options that had already been identified in the Preliminary Design stage but were now set aside. As noted below, the Preliminary Design stage would have been a useful stage to undertake consultation — not just the earlier brief development stage.

Consultation. It is acknowledged that the AWM has undertaken consultation — indeed it engaged consultation consultants, however, as noted above, this seems to only have occurred in the pre-design, brief development stages. To date there has not been consultation on the design stages, apart from government agencies and Indigenous groups. While it is acknowledged that the HMP policies do not refer to the need for professional stakeholder consultation, however this, including consultation with Moral Rights holders, should have happened during design development — particularly because the Reference Design removed the Institute’s award winning Anzac Hall.

Scope of Referral versus Redevelopment. An important processes issue is that the works that form the EPBC Referral are only part of the overall AWM's redevelopment project. All aspects of the redevelopment should be included in the one process that includes public scrutiny and review given the national significance of the place. Examples of this process issue include the temporary carpark, the extension of Poppy's carpark and changes to the Parade Ground. The Parade Ground proposal to increase its area and change its shape is not included in the Referral but is on the AWM website and shown in artist views (including in the Referral HIA).

REFERRAL DOCUMENTATION ISSUES

This report identifies six issues in the Referral documentation (some of which are associated with the project process issues noted above).

Status and availability of relevant documents.

There are some reports that appear directly relevant that are referred to in the HIA but not available either via the referral portal or the AWM website, these include: the AWM Site Development Plan 2017 and a Heritage Strategy 2018. The status of key documents directly relevant to the Referral is not clear and also a concern, such as the Heritage Strategy 2018 noted above that has not been published or endorsed like the 2008 Strategy. The HIA quotes the HMP 2019 as a final and states that it is expected to be accredited by the Minister for Environment 'by end of 2019'. Recent communication from DEE states that the HMP is now likely to be submitted for accreditation 'early in 2020'. This is relevant because the AWM Referral proposal for the removal of Anzac Hall is not supported by its own HMP 2019 that requires its retention.

Lack of Architectural Plans. This assessment of the Referral proposal has not assisted by the lack of scaled architectural plans to fully communicate the proposal and its potential impacts.

Impacts not identified specifically enough. The identification and evaluation of the impacts generally does not identify the specific nature of the impact which would assist an assessment of the degree of impact or where potential alternative solution may lay. In applying the EPBC Act Significant Impact criteria, the HIA may note a change or even impacts but not the question as to whether the change is consistent with values. Also, some discussion of the specifics of change should have been provided to show how, for example, in the physical changes for the new southern entrance that the Low tolerance for change classification for the Memorial exterior could be met in doing the works. As noted in Section 5.3 the reference to HMP policies and actions in the HIA should have been accompanied by an identification of the compliance of the proposal with policy.

Mitigation Measures. The mitigation measures that identify further design detail being developed by appropriate professionals is not going to assist with the large-scale impacts of this proposal. The mitigation measure that allows for the courtyard roof form to 'minimise the structure above' the parapet of the main Memorial building (and therefore to be as currently shown) and will be visible along the Parliament House Vista and is totally unacceptable.

Evaluation of impacts with reference to unrelated aspects. In some situations, the HIA provides a positive evaluation of a heritage impact using an aspect that bears no relation to the actual nature of the impact, for example, the above visibility in the vertical plane excused because of retained axial symmetry in the horizontally plane.

Sacrificial impacts that avoid focus on other impacts.

While it is agreed that the removal of Anzac Hall is a major impact there is a sense throughout the HIA that the removal of the Anzac Hall has become a 'sacrificial trigger' that may inadvertently mask the significant impacts of other aspects or in relation to the Significant Impact criteria where the loss of Anzac Hall and does not fully address the other sign impacts from the proposal such as damage, degrade, obscure or alter in a manner inconsistent with values.

5.5 KEY HERITAGE IMPACTS

In providing a summary of key heritage impacts it is appreciated and acknowledged that the AWM is very keen to see the role and visitation to the AWM continue and flourish to tell the important stories and that this is behind the proposed increase in the area of galleries. Nevertheless, this report finds that this does not justify the impacts that would result from the redevelopment as proposed.

IMPACTS FROM THE CHANGE IN THE ARRIVAL EXPERIENCE

The HMP 2011 states that the centre of the Memorial is the Commemorative area (including the Hall of Memory) located immediately within the main entrance on the southern façade. All visitors enter via the entry steps and are then immediately adjacent to and view the Commemorative area (see Figure 1.2) 'providing a solemn introduction to the place as not only a museum but also the national memorial to Australia's war dead' (HMP 2011).

The new southern entrance proposed at the lower ground level will, according to the HIA, require that the 'majority of visitors' use new lower entry, with the existing stairs used for ceremonial occasions. Although not explicit in the HIA, it is likely that given the security will be provided in the lower level that general visitors will be prohibited from entry via the existing stairs.

This change in access will result in a significant impact on the nature of the entry experience that for visitors is one of the key experiences of the AWM and one of both simplicity and immediacy in relation to experiencing the memorial aspect upon arrival up the existing steps with views to the Courtyard and Hall of Memory and then also looking down the Anzac Parade. The new entry experience will now be more that of entry to a museum with cloaking, security and a theatre.

While this change is identified as a perceived change of visitor arrival the actual nature of the impact is not acknowledged. This impact is that the immediate experience of the memorial function will be fundamentally lost. This report believes that this impact will be far greater and far more fundamental than noted. No mitigation for this impact is suggested in the HIA.

While it is agreed that the proposed new access will provide an improved Disability Discrimination Act (DDA) response that will include mobility impaired access to ceremonial events that support cultural values there will also be a fundamental impact on cultural values for the majority of visitors from this change. It is also appreciated that with increased visitor numbers that security screening, a modern world reality, would benefit from these changes – however an HMP 2011 policy (7.3.1) that 'security requirement and measures do not have an adverse impact on the heritage values of the AWM Campbell Precinct' remains relevant.

The HIA also refers to the existing entry area as the 'Ceremonial Entrance' and that in this change the upper level would be for Ceremonial events. This terminology is incorrect as the stairs are used for both general visitors and for ceremonial occasions.

While the vertical 'blades' that are part of the new southern entrance adjacent to the Parade Ground would be visible from Anzac Parade this would not result in an impact on the setting of the AWM or the Parliament House Vista. Equally, while the new 'nexus' element would be visible from the AWM entry, this would not result in an impact.

THE DEMOLITION OF ANZAC HALL

A discussion of the heritage values of the existing Anzac Hall as a recently constructed award-winning component of the AWM Campbell Precinct is provided in Section 2.4.

The HIA identifies potential significant impacts based on its inclusion in the NHL citation, however, it does not actually identify what the impact would be. The impact will be the loss of a highly contributory component of the AWM Campbell Precinct that provides evidence of the history of the careful thought that has been invested into the design evolution of the AWM. It would result in the loss of an important example of modern architecture, that while having its own strong design properties, it respectfully addressed its setting.

The contributory attributes of Anzac Hall include its highly efficient large functional space that tells key stories with large objects that are key to those stories, such the Japanese WWII midget submarine that attacked Sydney Harbour. Other contributory attributes include its setback and recessive relationship with main Memorial while maintaining a strong design form suggestive of aircraft and naval vessels and its use of high quality stone and metal materials that complement the main Memorial.

As a result of its high architectural qualities and contribution to its heritage setting Anzac Hall was awarded the Sir Zelman Cowan Award for Public Buildings in Australia by the Institute in 2005.

As noted in Section 2.4, the AWM heritage listings already acknowledge the contribution of Anzac Hall (and its receipt of the Sir Zelman Cowan award). The demolition of Anzac Hall is specifically contrary to both the HMP 2011 and HMP 2019 that require its conservation. It was identified as having Moderate tolerance for change in the HMP 2011 providing for some adaptation that respects its values.

There has been a national response in support of retention of Anzac Hall following publicity of the proposed demolition, including the Institute's Gold Medal winners and the Institute generally who has made clear that it remains 'fit for purpose'. The architects of the building Denton Corker Marshall wrote to the AWM and others in 2018 highlighting the cultural and heritage importance of building and indicating that they believed there were viable alternatives to demolition. As noted in this report, three of the four options addressed in the Preliminary Design phase of this redevelopment retained Anzac Hall.

While it has been discussed in relation to the proposed glazed courtyard, this report believes that the existing aerobridge that formed part of the Anzac Hall design works well providing views to the north face of the main Memorial building and does not reduce an ability to perceive the building 'in the round', as claimed in the HIA (see also below p38).

A key aspect of the Sir Zelman Coward Award is that it is for public buildings that are typically located within public settings containing buildings of many different periods where the awarded building is effectively recognised for its contribution to an existing heritage place or precinct, such as in this case. As noted in Section 2.4, from this author's experience in assessing heritage places for listing 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. Anzac Hall is already recognised for its heritage qualities in the HMP and this report believes that the peer recognition, the specific nature and associations of its public use and its technical and aesthetic values also reflect potential social values.

The HIA notes the potential Moral Rights issue in regard to Anzac Hall and, as discussed above in Section 5.4, one of multiple moral rights holders John Denton of Denton Corker Marshall has asserted his Moral Right in relation to Anzac Hall.

GLAZED COURTYARD AND NEW ANZAC HALL

The proposed new Anzac Hall and the glazed courtyard aspects of the proposal will have a significant adverse heritage impacts on the AWM as a whole 'valued as a place of great beauty' by the Australian community' (NHL) such that they require deletion from the scheme and alternatives found. Specifically the combined bulk of these two elements directly abutting and effectively enveloping the stepped and curved form of the north end of the main Memorial building will and also remove an ability to appreciate from an external viewpoint the essential character of the Sodersten building that conveys in its form the essential shrine aspects associated with the memorial function of the AWM.

The stepped cruciform form of the Memorial also has great historic importance as evidence of the original building design conceived as a memorial to honour sacrifices of WWI. This form should be retained as a separate structure as visible evidence of its original conception as a memorial to WWI.

The key adverse impact will be from the glazed courtyard addition that would be a major accretion butted up to the side wings of the Memorial and 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. This will also impact the intangible heritage values associated with the shrine function of the AWM.

Figure 1.3 shows the existing north west corner of AWM. Figures 52 and 53 in the HIA show the visual impact of the proposal on this north east corner (and 50 and 51 the north east side) that would result in the loss of external views to and appreciation of the full form of the Memorial building. Views from the south west corner of the Memorial from the area near the Lone Pine and views along the road and pedestrian path on the west side of the Memorial (Figure 1.5) will also clearly see this bulky impact on the AWM form.



As well as impacts on the Memorial form, the bulk of the glazed courtyard and the new Anzac Hall that will be visually attached to the Memorial will dominate and 'swamp' the existing building leaving the whole reading visually as one unrelieved form. The new Anzac Hall would also add considerably to the bulk of structures directly adjacent to Treloar Crescent.

As noted in Section 5.3 the glazed courtyard and new Anzac Hall do not comply with the HMP policy regarding various aspects of the main Memorial form, including Policy Action 1.11.1 (ensuring visual isolation), Policy Action 1.11.2 (development not to impinge on views from land axis), Policy Actions 1.12.1 and 1.12.5 (symmetry and visibility of cruciform form 'in the round'). In addition, although it was not included in the Referral documents the AWM Site Development Plan Review 2017 (p129 HIA) stated that 'the main Memorial building should dominate as part of a simple landscape setting, and that any developments within the precinct should not challenge or detract from this building'. The proposed new Anzac Hall and the glazed courtyard do not comply with that SDP.

The courtyard roof will be visible along the Land Axis and Anzac Parade (see HIA Figures 42 and 43) which would be a significant, not minor, impact which is unacceptable given the clear policy directions in relation to this aspect. While not altering the 'axial layout' (ie plan) it will be visible in the elevation of the AWM.

The glazed courtyard will impact the identified qualities and appreciation of the main Memorial building that would be visible above and attached to the northern elevation of the Memorial from Mount Ainslie creating one large roof form – see Figure 1.7. This report does not agree with the HIA statement that 'While a change of view to the main Memorial building will occur, they are not out of keeping with its setting or architectural values' (HIA p141).

The visibility of the main Memorial building form effectively from inside the glazed addition filled with large objects will not allow for that appreciation of its intangible heritage value as a complete Memorial building and as a shrine. The idea of visibility of the rear of the AWM from inside the courtyard is not the same as an appreciation of the building as a separate structure in totality as it is now.

While there should be opportunities found to tell the recent story of service as an essential part of the ongoing role of the AWM, the glazed courtyard seems to emphasis the physical evidence of these stories in a light filled open space that could never achieve the same level of 'storytelling' as exists in the current Anzac Hall. The big objects in the open space will dominate the space and reduce appreciation of the building.

This report rejects the idea that the aerobridge stops a perception of the main Memorial 'in the round'. The existing aerobridge does not obscure an understanding of the three-dimensional form and plan of the main Memorial building from external views and internal provides good views and understanding of the main Memorial. The aerobridge design was strongly supported by the NCA at the time of the building design to retain an appreciation of the full three-dimensional form over other schemes that had two linking bridges either side of the curved 'apse' of the Memorial (Gower S, The Australia War Memorial p107). Rather than being a 'dead space' and suggested in the HIA, the space between Anzac Hall and the Memorial provides continual views of Memorial to pedestrians and provides freedom to walk around the entire building.

In relation to the mitigative measures in the HIA relating to the glazed courtyard this report considers that the 'gross scale' impacts of the new Anzac Hall and glazed courtyard will not be reduced by detail design of meeting points and materials. It is a major structure attached to the main Memorial and clearly the structure and glazing is not resolved. For example, to achieve environmental standards the glazing may not be fully translucent as shown in views. Afternoon sun will be strongly reflective on the western elevation.

As noted in Section 4.5 regarding Design Guidance 12 that recommended that the height of the glazed courtyard 'remains below, or minimises the structure above, the main Memorial building parapet roofline so that the structure is not visible along the Parliament House Vista' This is no comfort as the roof will be visible and this provides the caveat 'or minimises the structure above' for it to remain that way.

POTENTIAL PHYSICAL IMPACTS TO MAIN MEMORIAL FROM THE NEW ENTRY

The proposal to remove and replace original fabric, such as removing and replacing steps, in undertaking the works in the entry area appears reasonable. The permanent removal of fabric such as the removal of original floor fabric inside the Memorial to construct the curved access ramps/stairs is also reasonable – however, more details should be provided and prior to any approval, of any fabric that is proposed to be removed and not replaced.

The underpinning and excavation under the Memorial wall are significant risk activities in an area with Low tolerance for change. Approval should not be provided unless the specific risks, and how to address these, are addressed before approval. The specific risks and strategies associated with this work should have been described in more detail in the report and therefore the 2m non excavation zone appears somewhat arbitrary unless it is based on detailed advice from a structural engineer with specific knowledge and relevant heritage experience. Additionally, the reference in the HIA to a specific limited role for a structural engineer is of concern – this critical work requires direct involvement of that engineer in the detailed design, including the preparation and approval of risk avoidance strategies, and regular inspections during the works themselves.

LANDSCAPE IMPACTS AND INCREASE IN HARDSTAND CHARACTER

The proposed overall redevelopment would change the landscape character of the AWM Campbell Precinct with a substantial increase in the footprint of built elements and associated paving areas, resulting in a hardening of the total landscape, including the removal of Australian tree species near the new southern entry that provide a softening and complementary ‘foil’ to the formal aspects of the site’s architecture.

Areas identified for an increase in hardened area include the Parade Ground (see below) and the Temporary carpark, now approved. A new Research Centre ‘shop front’ in the Eastern Precinct, included in the overall AWM redevelopment but not in this Referral (also see below), would create crowding near this activity and reduce the sense of separation of the main Memorial building in the landscape – one of its identified attributes. The design of the Eastern Precinct was awarded a Sir Zelman Cowan Award in 2011 and that process included careful work from all parties to avoid overall landscape impacts that is now threatened by these current proposals.

Tree removal impacts are not noted in the HIA but there would be a loss of landscape character. Three mature Eucalyptus maidenii would be removed in the area of the southern entrance – including a replacement tree known as the Queen’s Tree that presumably Queen Elizabeth planted as an original in 1954 and therefore of some significance. Mitigation should provide for replanting all the removed trees to retain treed landscape quality. The eucalypts provide an important Australian landscape character to the setting and replanting of similar character trees should occur. With the overall hardening of the landscape retaining or replanting character trees will be important. A condition of any eventual approval should include a landscape management plan prepared by a heritage landscape specialist.

IMPACT OF PROPOSALS NOT IN THE REFERRAL

As noted throughout this report, it is of concern that a number of redevelopment elements proposed by the AWM and included in its *Our Plans* section of the website are not included in this Referral. Section 3.4 identifies the issue around the Temporary Carpark approval. As noted above in the discussion in Section 5.4 of Project process issues, all aspects of the redevelopment should be included in the one process that includes public scrutiny and review, given the national significance of the place.

The Parade Ground proposal to increase its area and change its shape is not included in the Referral but is on the AWM website and shown in artist views (including in the Referral HIA). The increased size of the Parade Ground challenges the scale and relationship of site elements and generally a hardening of the total landscape. This aspect is located in a critical part of the overall AWM Campbell Precinct at the top of Anzac Parade and part of the Parliament House Vista area and should not be approved without being included in a Referral – as discussed below in Recommendations all the redevelopment aspects should be included in a public EPBC Act Referral process.

5.6 CONCLUSIONS

The conclusions provided here are a distillation of the material discussed in Sections 2-4 and the summaries of these sections provided at the start of this section and the impacts identified in Section 5.5.

Impact on Values

In relation to heritage values, Section 2.2 identified groupings of the listed key heritage values and these were also summarised in Section 5.2. The heritage impacts described in Section 5.5 will have the following effects on these values.

1. The Australian War Memorial and Anzac Parade together represent a landscape of great beauty and deep meaning of all Australians. The assessment of this report is that the main Memorial building and its separate architectural form, its landscape setting and views and vistas will be impacted by the proposal together with a reduced appreciation of its shrine form. A change in a direct and immediate appreciation of its memorial role from the new entry proposal and the visibility of additions in key axial views of the AWM would also impact this value.
2. It is appreciated that 'the nature of commemoration is based in equal parts in the relationship between the building, the collections of objects and records and the commemorative spaces' (CHL Criterion B2 Rarity) and that the collections are a key vehicle for commemoration. However, the change in the arrival experience and the bulk of the glazed addition will shift that balance and obscure and diminish the commemoration aspects.
3. Architectural values and cultural meaning of the AWM. The project will impact not just on architectural values, but also an appreciation of the history of its creation and its function as a shrine.
4. National meaning from the AWM's urban setting. The views to and from the Australian War Memorial have a deep cultural meaning that reflects the process of Australian parliamentary democracy at one end of that Land Axis, with the Australian War Memorial at the other end representing the individual sacrifices for that democracy. That the roof of the proposed glazed courtyard is visible (as shown in HIA artist views) above the rear of the main Memorial in this key axial view is totally unacceptable.

The Key Heritage Impacts

The Referral project would have three major adverse impacts. The first impact would be from the bulk and visibility of the glazed courtyard addition to the Memorial that will result in a loss of the visibility, not only the Memorial's architectural values and form but also its deeper meaning as a shrine. The second major impact will be the demolition of the award-winning Anzac Hall that is a highly contributory component of the AWM Campbell Precinct that in its design and location provides an appropriate separation to the main Memorial while 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 an experience of the memorial aspect so strongly visible in the current arrival experience.

The first and third of these impacts will both change and reduce the historically important memorial aspects of the AWM Campbell Precinct, while the second will impact its recent evolving history that has reflected the highest quality planning and architectural response to the AWM.

Section 5.5 identifies other heritage impacts of concern including the risks of impact of fabric changes to the Memorial for a new southern entrance and the change in overall AWM landscape and landscape character from all the proposed built forms and associated hard landscaping.

The Referral HIA does generally identify the concept of potential impacts but does not provide sufficient analysis of the specifics and degree of impacts.



Policy compliance

The assessment of impacts is not only about how the proposal may impact the identified heritage values, but also how the proposal complies with the conservation policies developed for the place — in this case Heritage Management Plans developed pursuant to the EPBC Act. This report identifies noncompliance with many policies associated with the form of the Memorial building and the arrival experience, but in particular with the policy that requires the retention of the existing Anzac Hall in both the HMP 2011 and HMP 2019. The Referral HIA does not appropriately address this aspect of policy compliance.

Project Process Issues

Three project process issues were identified in Section 5.4. The development of the project appears to have narrowed down too quickly and where Preliminary Designs that all met the functional requirement (and presumably other design options such as new satellite galleries at other sites) did not have the opportunity to be tested by a competitive design process. That stage could also have included consultation with the public and professional stakeholders and also Moral Rights holders who have yet to be consulted.

The third project process issue is that the Referral is only for some parts of the Redevelopment when all aspects of the Redevelopment should have been included in the one public process. There would also be heritage impacts from these ‘non referred’ parts of the redevelopment such that these aspects, such as the Parade Ground changes, should also be referred.

Referral Documentation Issues

The status and availability of a number of relevant documents noted in the Referral documents is of concern. Perhaps the key one is the HMP 2019 that is quoted extensively in the HIA and apparently has been through the required public process and been ‘finalised’ but is still to be accredited via the EPBC process while at the same time the AWM is putting forward a proposal involving the demolition of Anzac Hall that fundamentally does not comply with policy in that HMP. It can be argued that the Referral should be put aside while accreditation of the HMP 2019 occurs. The Referral scheme should then be revised to comply with the HMP policy on retention or the Minister for the Environment should be provided with a compelling argument as to why there are no prudent alternative options available to comply with their HMP.

Finally

In a recent newspaper article on the redevelopment Steve Gower, a former AWM Director, quoted the essential inspiration and thoughts of CEW Bean that the War Memorial be a ‘gem of its kind’ and that it not be ‘colossal in scale’. While the AWM needs to reflect Australia’s involvement in many conflicts since Bean’s time that puts pressure on the museum aspects, it is important to recognise that still today the experience of arrival and views to the Commemorative space is amazingly simple in both its directness and scale and therefore is also equally direct in its emotional impact as a shrine. This aspect must not be lost.

While the consultation undertaken in developing the Detailed Business Case for the project that aims to improve visitor interaction is acknowledged, the whole Australian community will be impacted by the change in the arrival and impacts of the glazed courtyard in relation to the memorial role of the AWM.

EPBC Act section 341ZC of the EPBC Act requires that actions that lead to adverse impact on NHL or CHL values be avoided unless there are no prudent alternative and that all measures to mitigate the actions can and are taken. This report finds that there are likely to be prudent alternatives to the current action and impacts that would result from this Referral.

5.7 RECOMMENDATIONS

The issue regarding the status of the HMP 2019 already noted, the non-referral of parts of the AWM redevelopment, the heritage impacts identified in this report, the Moral Rights aspects, as well as clear indications that there are alternative options involving less impact, when taken together suggest that the Referral project should not proceed.

While refusal under the EPBC Act is an option given the impacts, an opportunity should be available for the AWM to review and remove aspects such as the demolition of Anzac Hall, the glazed courtyard and revise the southern entry such that the current entry experience is retained while improving DDA aspects (so that at least there is an ability to choose to walk up the entry steps).

The findings of this report and the significance of impacts suggest that there would be very limited value in further considering this Referral via a Public Inquiry or Public Environment Report until the AWM fully reviews and revises it.

That process of scheme revision by the AWM should include both broad public consultation, consultation with stakeholders' groups (veterans and organisations representing professionals such as the Institute) and also consultation with Moral Rights holders.

This report finds that given the significant heritage impacts the refusal of this Referral under the EPBC Act would be justified, however, given alternative options appear feasible, it is recommended that the Referral should be identified as a Controlled Action and that the AWM be required to review and revise the scheme to identify prudent alternatives that would retain Anzac Hall, not proceed with the 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 pathway that includes opportunities for substantive public review and comment given the national significance of this place.





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