



Australian
Institute of
Architects

Australian War Memorial Development Project

Parliamentary Standing Committee on Public Works

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SUBMISSION BY

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PURPOSE

- This submission is made by the Australian Institute of Architects (the Institute) to provide comments on the Australian War Memorial Development Project.
- At the time of this submission the National President of the Institute is Professor Helen Lochhead.
- The Chief Executive Officer is Julia Cambage.

INFORMATION

The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation representing over 12,500 members across Australia and overseas.

The Institute exists to advance the interests of members, their professional standards and contemporary practice, and expand and advocate the value of architects and architecture to the sustainable growth of our communities, economy and culture.

The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible and environmental design.

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1. INTRODUCTION

The Australian Institute of Architects (the Institute) is the peak body for the architectural profession in Australia, representing over 12,500 members. The Institute works to improve our built environment by promoting quality, responsible, sustainable design. Architecture influences all aspects of the built environment and brings together the arts, environmental awareness, sciences and technology. By combining creative design with technical knowledge, architects create the physical environment in which people live, which in turn, influences quality of life. Through its members, the Institute plays a major role in shaping Australia's future.

The Institute welcomes the opportunity to make a submission to the Parliamentary Standing Committee on Public Works regarding the Australian War Memorial (AWM) Development Project. We have taken this opportunity to outline our significant and ongoing concerns about the project including the planned demolition of Anzac Hall and threats to the heritage value of the site, particularly the nationally significant Eastern Precinct Development.

The Institute would also be pleased to provide verbal evidence to the Committee on any issues addressed below, or in the attachments provided along with this submission.

2. OVERVIEW COMMENTS

On 1 November 2018, the Australian Government approved the AWM Development Project with funding of \$498.7 million over a nine-year period commencing in 2019/20.

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

The proposed Development Project includes a new entry into the main building, the southern and eastern extension of the Charles Edwin Woodrow (CEW) Bean Building, the modification of the Parade Ground and the removal and replacement of Anzac Hall. This means that there is significant potential for cumulative impact on the National Heritage values of the site.

In December 2019, the then Department of Environment and Energy (DEE), now Department of Agriculture, Energy and the Environment (DAEE), invited public comment on the AWM Development Project referral under the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act).

When reviewing the documentation associated with the referral the Institute became concerned that the referral did not sufficiently address the requirements of the Act in identifying the impacts of the proposal on the heritage values of the AWM. Due to this the Institute sought expert advice from a reputable heritage architect.

Commissioned by the Institute, Ashley Built Heritage undertook an independent Heritage Review of the project Referral under the *EPBC Act 1999* and this comprehensive document is provided at [Appendix A](#) for the benefit of the Public Works Committee in its broader consideration of the AWM Development Project.

Of particular note is that Ashley Built Heritage has identified that the Development Project 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. A major impact includes the demolition of the award-winning Anzac Hall that is a highly contributory component of the AWM Campbell Precinct, carefully set back from main Memorial to protect its setting while still having its own architectural qualities of the highest order.

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

The Institute would like to clearly note that Ashley Built Heritage was engaged to prepare the independent Heritage Review due to the exemplary skills and career history of Principal Geoff Ashley. Mr Ashley is a member of Australia ICOMOS, he has a degree in architecture and over three decades of experience in advising on all types of heritage places and levels of significance. He was also an integral part of the team that in 2011 prepared the currently accredited/endorsed Heritage Management Plan for the AWM.

3. DUE PROCESS CONCERNS

The Institute has enduring concerns about the process undertaken from the inception of the AWM Development Project. These include:

- a Reference Design, that included the demolition of Anzac Hall, as a mandatory requirement in the architectural design competition, even though three other Preliminary Designs met the same floor space requirements but retained Anzac Hall;
- public consultation for the development project that predominately related to early parts of the functional brief, rather than actual design concepts. It has also not included professional stakeholders such as the Institute or the Moral Rights holders of Anzac Hall;
- only some parts of the development have been under consideration or are being reviewed by the Public Works Committee when all aspects should have been included in the one review process. The heritage impacts from these 'non referred' parts of the development should have been included in the Development Project now being considered; and
- the approval of the 2019 AWM Heritage Management Plan has been delayed, compromising assessment of the heritage impacts of the Development Project on the site. The 2019 HMP should have been approved and made publicly available before assessment of the heritage impacts of the Project were sought from DAEE.

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

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

At the time the Institute advised the NCA that the Temporary Carpark Project application presumed that the \$498.7 million AWM Development Project would proceed and that Public Works and NCA approval would be granted. It is the view of the Institute that the separate consideration and early approval of the Temporary Carpark Project further prejudiced the proper consideration of future applications forming part of the overall Development Project.

While it may have been technically feasible to apply for and receive approval for these works based on the costs involved, the total AWM Development Project should have been subject to a review process before any approval was given for related parts of the project and the associated

expenditure of funds. The combined and cumulative impact on the National Heritage values of the AWM must be considered in detail.

Of further concern to the Institute is that this Inquiry is being undertaken at the same time as the project referral to DAEE under the *EPBC Act 1999*, and without an updated and approved HMP in place. The Institute is extremely concerned that the Public Works Committee will be asked to make a final determination on the Development Project without necessary information on the heritage impacts of the development. This is again exacerbated by other parts of the Development Project being approved and progressed independently and without Public Works Committee oversight or *EPBC Act 1999* Referral.

4. PLANNED DEMOLITION OF ANZAC HALL

Extremely concerning to the Institute and its members has been that the Memorial has widely and very publicly committed itself to a development plan that includes the demolition of Anzac Hall. Opened in 2001 at a reported cost of \$11.3 million, Anzac Hall has been lauded for its sensitivity to the heritage and cultural context of this national memorial while also providing functional design.

The AWM is included on the Australian Institute of Architect's register of Nationally Significant 20th-Century Architecture. In 2005, architects Denton Corker Marshall (DCM) won the Institute's prestigious national Sir Zelman Cowen Award for Public Architecture and the Canberra Medallion for Anzac Hall. DCM are also an award-winning architectural firm including being recipients of the "Australian Institute of Architects' Gold Medal", the highest honour the Institute can bestow. The award recognises the exceptional body of executed work and outstanding contribution of DCM to the development of the architecture profession and the built environment in Australia.

There is a direct relationship between recognition by groups such as the Institute (and others such as Engineers Australia) for the work of their peers and the eventual recognition of values by the broader community through heritage listing. The AWM heritage listings already acknowledge the contribution of Anzac Hall to the precinct. Given time, it is extremely likely that Anzac Hall would obtain a direct heritage listing in its own right.

The current and pending AWM Heritage Management Plan's (2011 and 2019) also recognise the importance of Anzac Hall to the AWM Campbell precinct and require that Anzac Hall be retained and conserved. At the same time, the Memorial continues to prosecute a Development Project that requires the demolition of Anzac Hall. At only 19 years of age, Anzac Hall is considered young in public building terms, where average lifecycles are 50 to 100 years.

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

There has been very limited transparency in the decision making process regarding this project and the Institute has seen no evidence that the demolition is required. Nor has there been an appropriate level of community consultation on options that include the retention of Anzac Hall.

5 IMPACT ON THE EASTERN PRECINCT

The Eastern Precinct Development by Johnson Pilton Walker also won the Institutes prestigious Sir Zelman Cowen Award for Public Architecture and the Canberra Medallion in 2011. The effort the Memorial took to develop the Eastern Precinct adjacent to the AWM main building was significant.

The Memorial followed due process under the *EPBC Act 1999*, including review and approval by the Public Works Committee with the result being a HMP and site development plan that worked together with a collaborative and collegiate team to produce an award winning development that had very little impact on the AWM and which is still highly celebrated.

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

The cumulative impact of all planned development must be considered in detail to ensure that the effort taken to prioritise heritage values, maximise eucalypt retention and minimise vegetation loss during earlier development projects is not lost through insufficient planning and appropriate oversight when undertaking future development. The already approved tree removal and car park development, along with the broader Development Project has the potential to cumulatively impact significantly and negatively on the heritage and architectural value of the entire site.

6. ADVOCACY BY THE INSTITUTE

The Institute has been very clear from the outset that we do not believe that due process has been undertaken with regard to the Development Project. Specifically, we believe that the Memorial has widely and very publicly committed itself to a development project that includes the demolition of Anzac Hall before any approvals have been given for demolition or new development.

The Institute first stated its opposition to the demolition of Anzac Hall when the announcement of the Development Project was made in November 2018. We met with Dr Brendan Nelson AO, the then Director of the Memorial, to discuss what options were considered other than demolition. We were informed that many options were considered but only one involved the demolition of Anzac Hall and that was what the Council of the Memorial had already agreed upon.

We were informed that the reference design would be the only option that would be considered. This was of concern given that no approvals had been sought or given from the then Department of Environment and Energy (DEE) under the EPBC Act regarding heritage matters, the Public Works Committee or the NCA.

Throughout the following months, we voiced our concerns that there had been inadequate consultation with the public about the Development Project. In April 2019, we sent an open letter to members of the Memorial Council and to the Federal Government. The letter was signed by seven Gold Medal award-winning architects expressing their deepest concerns about the demolition of Anzac Hall as part of the expansion of the Australian War Memorial ([Attachment B](#)).

Expressions of Interest (EOI) for architectural design services were called by the Memorial, and that document only allowed for 'reference design' options that included the demolition of Anzac Hall. While an announcement was made by the Memorial Director on ABC radio that they would consider other designs, this was not widely known.

We have been told by some Institute members that they did not submit an EOI on the basis that they were restrained by the EOI requirements. Our position is that this was a missed opportunity to hold an open competition and receive innovative and creative designs that would fulfil the Memorial's requirements without being tethered by the reference design. It is our understanding that when the contract was let, it did not include this constraint, but the decision about the design was already made at that point.

In August 2019, in anticipation of a referral under the *EPBC Act 1999* by the Memorial, the Institute addressed our concerns to the then Department of Environment and Energy about the process followed by the Memorial in relation to heritage considerations for the Development Project, particularly the extent to which the project had progressed without the relevant heritage approvals in place. We recommended that the Memorial undertake further consultation and seek independent expert heritage advice on the development proposal as required by its legislated Heritage Strategy and Heritage Management Plan.

In November 2019 we made a submission to the NCA on the *AWM Works Approval application for the extension of Poppy's Café Carpark and installation of a temporary carpark at Block 3 Section 39 Campbell*. In this, we reiterated our concerns about heritage values not being addressed sufficiently.

In December 2019, the then Department of Environment and Energy invited public comment on the development referral under the *EPBC Act 1999*. The Institute was concerned that the referral did not sufficiently address the requirements of the Act in identifying the impacts of the proposal on the heritage values of the AWM. The Institute sought expert advice and responded to that referral and provided an independent report from a reputable heritage architect that we had commissioned to add technical advice to our submission. As noted, this report by Ashley Built Heritage is provided at [Attachment A](#) for consideration by the Public Works Committee.

The Institute will continue to voice strong opposition to the development plans. While welcoming efforts to further honour the stories of Australia's servicemen and women, we are at a loss as to why alternatives that allowed for the preservation of Anzac Hall as part of the development plan were not further explored. This is of particular concern, given that the existing and pending heritage management plans for the site require its retention, conservation and interpretation. We are also more broadly concerned that the Development Project threatens the heritage values of the entire site, including the Eastern Precinct Development.

7. FINAL RECOMMENDATIONS

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

The Memorial has legislative obligations for the protection and conservation of the AWM heritage values for all Australians. It is not apparent that the Memorial has liaised effectively or to the extent required for such a significant project with the Department of Agriculture, Energy and the Environment, NCA or other identified stakeholders to properly assess the proposal's cumulative impact on the site. Over development will lead to significant adverse loss of the qualities that make the AWM nationally significant.

It is the view of the Institute that the Memorial has not adequately provided a compelling argument, and confirmation that due process has been followed. There can be no public confidence that the stated purpose of the proposed work and its suitability for that purpose, the need for the work or the cost-effectiveness of the proposal is ensured and has been adequately justified by the Memorial.

The original decision-making process undertaken by the Memorial and the reasons why the tender process was tied to the reference design instead of allowing submissions that retained Anzac Hall should be made public and scrutinised in detail by the Public Works Committee as part of this Inquiry. The Australian public must be able to be satisfied that due process has occurred from the very beginning of the Development Project, including the decision to not thoroughly explore design options that included the retention of Anzac Hall.

The response of the Memorial under the *EPBC Act 1999* to heritage issues should also be under review by the Public Works Committee. It is not right and proper that this Inquiry is being undertaken at the same time as the project referral to DAEE under the *EPBC Act 1999*, and without

an updated and approved HMP in place. It is impossible for the Australian public and members of the Institute to have confidence that the Public Works Committee has the necessary information on the heritage impacts of the development in order to make an informed decision on the stated purpose of the proposed work and its suitability for that purpose, the need for the work or the cost-effectiveness of the proposal.

As the national institute for architects, we have a remit to seek to preserve Australia's architectural heritage and to promote sustainable development, to conserve energy and resources and minimise waste. Fortunately, many aging buildings are worth saving and deserve longer lives. Their functional and technical obsolescence can be remedied in ways that are financially feasible. They can be successfully remodelled, reconfigured or enlarged and, equally important, repurposed to efficiently meet current and future requirements.

It is the Institute's position that significant public buildings that are of cultural, social and environmental value should not be demolished if they have a useful life. Anzac Hall should be preserved for current and future generations. Its demolition is unnecessary and unwarranted. There is no reason why Anzac Hall cannot be retained and the aims of the Development Project still be delivered. Demolishing an award winning and culturally significant public building that is only 19 years old should never have been considered appropriate. The Public Works Committee should reject the proposed Development Project and insist on the retention of Anzac Hall in any future expansion proposals.

While the proposed demolition of Anzac Hall is of extreme concern to the Institute and our members, it is also our belief that the current Development Project, and associated projects that are already underway could, cumulatively lead to the adverse loss of the qualities that make the AWM nationally significant. On behalf of all Australians the Public Works Committee must be careful to ensure that this does not occur.