

**BLOCK 3 SECTION 39 CAMPBELL  
AUSTRALIAN WAR MEMORIAL**



National Capital Authority

Submission date: 30 April 2021

## ABOUT THE INSTITUTE

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The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with around 12,000 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.

## PURPOSE

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- This submission is made by the Australian Institute of Architects to provide input to the National Capital Authority consultations on the “early works” proposal for Block 3 Section 39 Campbell– Australian War Memorial.
- At the time of this submission campaign spokesperson for the #handsoffanzachall campaign is Clare Cousins, FRAIA Past National President, Australian Institute of Architects.
- The President of the ACT Chapter is Shannon Battisson RAIA.
- The Chief Executive Officer is Julia Cambage.

## CONTACT DETAILS

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# 1 SUMMARY COMMENTS

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The Australian Institute of Architects has provided this submission to outline our ongoing concerns with the Australian War Memorial's (AWM) Redevelopment Project, including the planned demolition of Anzac Hall and threats to the National Capital Plan.

These comments are in response to the current public consultation being coordinated by the National Capital Authority (NCA) and following our review of the provided documentation regarding the "early works" proposal for Block 3 Section 39 Campbell-Australian War Memorial. We are happy for these comments to be made public as part of the consultation process.

On 1 November 2018, the Australian Government approved the AWM Redevelopment Project with funding of \$498.7 million over a nine-year period commencing in 2019/20. The proposed Redevelopment 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 and on the National Capital Plan.

The Institute recognises the need and in principle 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. It is also essential that any redevelopment preserves and meets the requirements of the National Capital Plan.

At no time has the Memorial been upfront about the demolition of Anzac Hall in their public consultations, systematically misrepresenting the level of public support for the project while also downplaying community concern. This now continues with the NCA attempting to hide the demolition of Anzac Hall as "early works".

To fast track the demolition of Anzac Hall before the NCA has even assessed the consistency of the AWM Redevelopment Project with the National Capital Plan, and if the project should even proceed as designed, is underhanded and extremely concerning.

To break the project up, and attempt to hide the demolition of Anzac Hall while at the same time minimising opportunities for public consultation, is another of a long list of failures of due process related to this project. It is simply not appropriate for the NCA to seek to approve the demolition of Anzac Hall separately from consideration of the Redevelopment Project as a whole.

The Institute remains dismayed by failures of due process in seeking to demolish Anzac Hall. We are equally concerned about the consequences for other icons if the AWM, a preeminent national institution, is permitted to disregard its heritage obligations by the NCA.

The strength and value of Australia’s legislated environmental and heritage protections and the guardianship of the National Capital Plan that rests with the NCA will be undermined if such a blatant violation of the Heritage Management Plan for such an iconic site were permitted to proceed.

To date all of the heritage advice, including from the government’s own principal heritage advisor the Australian Heritage Council, has been consistent in finding that the demolition of Anzac Hall will – unequivocally – have a significant negative impact on the AWM’s heritage value. The Heritage Management Plan included in the current “early works” documentation also supports this finding.

For the NCA, in the public consultation information for the “early works” approval, to pre-emptively state that all heritage concerns have been ameliorated through the assessment and approval given under the Environment Protection and Biodiversity Conservation (EPBC) Act 1999 is disingenuous. Our concerns related to the demolition of Anzac Hall, heritage and due process are highlighted in further detail at [Appendix A](#).

In summary, the Memorial has legislative obligations for the protection and conservation of its heritage values for all Australians as does the NCA in the protection of the National Capital Plan. While we appreciate there may be a need to increase the Memorial’s capacity, including some expansion, we oppose doing this in a way that is wasteful, destructive, and damaging to the heritage value and integrity of the site as well as to the National Capital Plan.

We fully support the goal of enhancing the memorial and better commemorating our servicemen and women, all we are asking is that it be done in the right way. The Institute does not believe that these “early works” should be allowed to proceed, and in addition that it is completely inappropriate to consider the demolition of Anzac Hall separately from consideration of the Redevelopment Project as a whole.

It is not right and proper, or in line with the NCAs statutory duties to consider any aspect of the redevelopment including the current Works Application without reviewing or approving the entire Redevelopment Project.

The NCA must protect the National Capital Plan and withhold approval of the “early works” project. The \$500 million Redevelopment Project must be assessed as a whole.

<b>Recommendation 1</b> →	<b>The NCA must reject and refuse approval of the “early works” Block 3 Section 39 Campbell – Australian War Memorial application.</b>
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<b>Recommendation 2</b> →	<b>The \$500 million AWM Redevelopment Project must be assessed as a whole and “early works” should NOT proceed.</b>
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## 2 RECOMMENDATIONS

Recommendation 1 →	The NCA must reject and refuse approval of the “early works” Block 3 Section 39 Campbell - Australian War Memorial application.
Recommendation 2 →	The \$500 million AWM Redevelopment Project must be assessed as a whole and “early works” should NOT proceed.
Recommendation 3 →	The planned demolition of Anzac Hall must be stopped, and an acceptable alternative found instead.
Recommendation 4 →	<p>The full scale and impact of the AWM Redevelopment Project is not understood by the Australian community.</p> <p>Groups and citizens that are aware consistently do not support the demolition of Anzac Hall.</p> <p>The demolition of Anzac Hall must not be allowed and any future development must involve thorough community consultation.</p>

## APPENDIX A – ANZAC HALL

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### 1. Planned demolition of Anzac Hall

Extremely concerning to the Institute and its members has been that the Australian Government and the Memorial have, from the start, widely and very publicly committed itself to a Redevelopment Plan that includes the demolition of Anzac Hall.

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

There is a direct relationship between recognition by groups such as the Institute (and others such 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 Heritage Management Plan's for the site (2011 and 2019) also recognise the importance of Anzac Hall to the AWM Campbell precinct and require that Anzac Hall be retained and conserved.

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 the memorial while also providing functional design. Anzac Hall is considered young in public building terms, where average lifecycles are 50 to 100 years. Destroying such an investment – of effort, culture, and family memories – is a waste and mark of disrespect.

The demolition of an award winning building that remains fit for purpose and with options for extension and redevelopment is objectionable, even more so in an setting where government resources must be extended across a range of competing demands. It is also not appropriate from an environmental and sustainability standpoint to undertake the demolition.

Architects are passionate about preserving Australia's heritage and honouring our national history, nowhere more so than the extraordinary service and sacrifice of the servicemen and women. In recognition of this Anzac Hall was designed with care and sensitivity to the highest standards of design excellence, an effort recognised when it was selected above any other piece of public architecture to receive the Sir Zelman Cowen Award.

The AWM is one of our nation's most significant monuments and a site of immense pride and emotion for the Australian community and this includes Anzac Hall, which is a national landmark and much-loved exhibition space. The Institute believes that the planned demolition of Anzac Hall must be stopped, and an acceptable alternative found instead.

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.

<b>Recommendation 3</b> →	<b>The planned demolition of Anzac Hall must be stopped, and an acceptable alternative found instead.</b>
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## 2. Public consultation and community support

The public consultation process has been deeply flawed from the outset and has lacked transparency and failed to proactively engage with key stakeholders including the Institute and the Australian Heritage Council. This inadequate consultation continues with the NCA allowing the Memorial to hide the demolition of Anzac Hall in this “early works” application.

Throughout the EPBC documentation and again during the NCA process, the Memorial consistently downplays criticisms of its plans and overstates support. Concerningly, the Memorial misrepresents the exact nature both of its own consultations and the feedback received.

The AWM continues to outline that the Memorial’s heritage self-assessment, EPBC Act referral, supporting Heritage Impact Assessment and material has been made available at consultation events and to online survey participants and that this has made clear that there would be a ‘significant impact’ on heritage values due to the demolition of Anzac Hall and development of a new Anzac Hall and Glazed Link.

As an outcome from these “consultations” the Memorial has concluded that *“In general, the consultation process indicates broad acceptance of the need to replace Anzac Hall, despite the associated heritage impact.”*

Yet the copy of the presentation used by the Memorial and the survey questionnaire both appear to contain no mention of the proposed demolition of Anzac Hall, its young age, or its award-winning architectural sensitivity to the site’s heritage values.

Indeed, it would appear that there has never been any clear, transparent and genuine public or stakeholder consultation about the proposal to demolish Anzac Hall. On the contrary, the demolition of Anzac Hall has consistently been presented as non-negotiable since the announcement of the redevelopment in November 2018, despite relevant approvals not yet having been obtained.

Even a cursory examination of the 167 submissions received as part of the July 2020 public consultation process co-ordinated by the Memorial reveals widespread concern with the project, and the demolition of Anzac Hall in particular, as opposed to the near-universal support the AWM purports that the plans enjoy.

Although the views of experts, including the Institute, have been consistently dismissed as the “strong objections of a small number of stakeholders with particular and limited interests” it is also clear in the Memorial’s own consultation records that these concerns are in fact, widely shared.

The architectural community's concerns about the proposal's heritage impacts are shared not only by community interest groups, but by the veterans' community and was in fact raised most frequently by Contemporary Defence Families, as was questions related to the need for the redevelopment at all.

In the face of what has been widespread opposition to the redevelopment plans, as they currently stand, it would appear that the AWM has sought to reverse engineer its consultation process to meet a pre-determined outcome.

<b>Recommendation 4</b> →	<p><b>The full scale and impact of the AWM Redevelopment Project is not understood by the Australian community.</b></p> <p><b>Groups and citizens that are aware consistently do not support the demolition of Anzac Hall.</b></p> <p><b>The demolition of Anzac Hall must not be allowed and any future development must involve thorough community consultation.</b></p>
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### 3. Heritage impacts

All of the heritage advice has been consistent in finding that the demolition of Anzac Hall will – unequivocally – have a negative impact on the AWM site's heritage value.

The AWM's Heritage Management Plan is absolutely unambiguous on this point and explicitly requires that Anzac Hall is conserved, managed and retained, refer clause 1.11 *"Conserve, manage and interpret the Anzac Hall as a part of the AWM main building"*.

The Heritage Impact Statement required for the EPBC process commissioned by the Memorial in June 2020 found *"The loss of the existing Anzac Hall is a sole significant loss of value and has a substantial negative impact on the heritage significance of the place."*

The AWM's EPBC Final Preliminary Documentation notes that *"The proposed works include the demolition of Anzac Hall which embodies part of the aesthetic values of the place; this is a **significant negative impact** and the most detrimental aspect of the proposal."*

The government's own expert advisor, the Australian Heritage Council has concluded that the proposed redevelopment will *"have a serious impact on the listed heritage values of the site"* and is unable to support the proposal.

The International Council on Monuments and Sites, an advisory body to the United Nation's UNESCO world heritage committee, has expressed its opposition to the redevelopment plans.

The Memorial has not demonstrated any appreciable track record in recent times for competently managing the heritage aspects of this site, a fact attested to by its failure to update the Heritage Management Plan within statutory timeframes and, critically, before embarking on such a wholesale redevelopment project.



Furthermore, there is no indication that the Memorial prepared a robust heritage impact assessment and heritage advice in the lead up to planning for this major redevelopment. Advice of this nature appears to have been sought **after** making the decision to demolish Anzac Hall. This is despite it being clear that retaining Anzac Hall as part of any expansion is feasible and was considered in 3 out of 4 of the preliminary design options. However, the Memorial has simply stated:

*“Option 1 was identified as the preferred option by the Memorial Executive and was subsequently endorsed by the Memorial’s Council. The proposed options were not the final design outcomes but served as an indication of where the major additional space would be constructed. Option 1 was considered the only option that met all of the Project objectives.”*

And while the AWM asserts that in the Request for Tender process, “Architects were free to explore retention and expansion of the Anzac Hall structure as their design solution” it was only Option 1 – requiring the demolition of Anzac Hall – that was included in the preceding EOI process as the design reference – further evidence that feasible alternatives were not seriously explored.

There has been failure, after failure, after failure when it comes to the consultation and decision-making process around this project. The Australian Government and the Australian War Memorial have demonstrated zero accountability and zero concern for the views of the community when it comes to the future of this nationally significant monument to the brave, heroic and courageous conduct of Australia’s servicemen and women.

The Institute therefore strongly recommends that the NCA not approve the current “early works” application and require the Memorial to re-submit the entire Redevelopment Project for approval as a single application.

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