



Australian Institute of Architects

2a Mugga Way
Red Hill ACT 2603
PO Box 3373 Manuka 2603
T +612 6121 2000
policy@architecture.com.au
architecture.com.au

4 November 2019

RE: Australian War Memorial (AWM) Works Approval Block 3 Section 39 Campbell

Dear National Capital Authority,

The Australian Institute of Architects (the Institute) welcomes the opportunity to make a submission on the Australian War Memorial (AWM) Works Approval application for the extension of Poppy's Café Carpark and installation of a temporary carpark at Block 3 Section 39 Campbell. The Institute has also taken this opportunity to outline our ongoing concerns about the broader "Redevelopment 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 is the peak body for the architectural profession in Australia, representing around 11,000 members. The Institute works to improve our built environment by promoting quality, responsible, sustainable design. Architecture influences all aspects of the built environment and brings together the arts, environmental awareness, sciences and technology. By combining creative design with technical knowledge, architects create the physical environment in which people live, which in turn, influences quality of life. Through its members, the Institute plays a major role in shaping Australia's future.

OVERVIEW COMMENTS

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 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 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.

The current "Works Approval application for the extension of Poppy's Café Carpark and installation of a temporary carpark at Block 3 Section 39 Campbell" is proceeding as a "stand alone" project and separate from the bulk of the Redevelopment Project. This application presumes that the redevelopment will proceed and that Public Works and National Capital Authority (NCA) approval for the future works will be granted. It is the view of the Institute that this application has the potential to prejudice due and proper consideration of any future applications/s.

The Institute does not agree that it is appropriate for the application to be considered as a stand-alone project, without review from the Department of Environment and Energy or Public Works Committee, or for the Memorial to self-assess heritage values under the *Environment Protection and Biodiversity Conservation Act 1999*

The Urban Planning Report for the current Works Approval application outlines that while this Works Approval may not comply with the provisions of the Constitution Ave and ANZAC Parade Precinct Code or that they are “not applicable”, it is noted that:

The future stages of the redevelopment will be able to appropriately reflect the character of the national capital.

The Institute believes it is impossible to assert this without a Detailed Business Case and full proposal for the entire Redevelopment Project being considered by the NCA, the Parliamentary Standing Committee on Public Works and the Department of Environment and Energy under the *Environment Protection and Biodiversity Conservation Act 1999*, particularly as a Matter of National Environmental Significance (MNES).

The NCA should reject the application and insist that approval for the total Redevelopment Project be sought instead and include the car park extension. The combined and cumulative impact on the National Heritage values of the AWM must be considered in detail.

CURRENT PROPOSAL

Tree removal

The removal of a significant number of mature trees as part of the carpark redevelopment is not supported by the AWM Heritage Management Plan and the Institute believes this action will negatively undermine the landscape setting of the AWM which is held in high esteem by veterans and community members.

Around 63 trees will have to be cleared and the Heritage Impact Statement notes that the plans are “not fully consistent” with some policies in the AWM and Parliament House Vista Heritage Management Plans. It also notes that the works are expected to have a moderate impact—especially in the medium term – on the war memorial’s “aesthetic characteristics”. This is based on an assumption that a currently unknown/undocumented mitigation strategy will effectively re-create an informal landscape character with native trees.

The successful re-establishment of the site in line with National Heritage values should be fully detailed in the current proposal. It is impossible to claim that the impact will be mitigated, without a plan to do so. Revegetation with native trees must be integral to the mitigation strategy. The species proposed for the re-establishment are not known and there is no evidence given that the native landscape is able to be replaced and grown in an ‘on-slab’ environment.

The Eastern Precinct Development (2011) restricted the extent of the underground carpark to provide increased area for eucalypt retention and new vegetation growth. This was identified as integral to design and heritage considerations, which was accepted and approved under the *Environment Protection and Biodiversity Conservation Act 1999*, referral program and the NCA and Public Works Committee.

It is known that the removal of 63 trees will negatively undermine the landscape setting of the AWM, yet the plan considers no alternative options. It is incongruous that the current carpark extension is not being given the same level of oversight and review as the Eastern Precinct Development.

Need for additional parking

The carpark extension proposal is not mentioned in the current AWM Heritage Management Plan and site development plan. The documentation provided by the NCA as part of the public consultation does not determine or justify the need for additional on-site parking, nor does it consider alternative options that could have been used for the temporary carpark, including transporting in site workers. It also doesn't consider other alternatives for visitor access to site other than private vehicle transport and increased parking.

The proposal also does not consider the relative merits (or otherwise) of alternative on-site car parking options including the eastern end of Treloar Crescent which has been previously identified as potential surface parking in the AWM site development plan.

The Temporary Traffic Management Plan for the current work application has also been developed using an out-of-date drawing of the AWM site, which predates the Eastern Precinct Development. The merits, or otherwise, of the Temporary Traffic Management Plan are therefore unable to be appropriately considered.

Architectural value and moral rights

An updated Heritage Management Plan is currently under review by the Department of Environment and Energy. This document highlights the value of existing plantings and references the site development plan used for the Eastern Precinct Development.

The Eastern Precinct by Johnson Pilton Walker won the Institutes prestigious Sir Zelman Cowen Award for Public Architecture in 2011 at the National Architecture Awards¹. 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 *Environment Protection and Biodiversity Conservation Act 1999*, including review and approval by the Public Works Committee with the result being a Heritage Management Plan 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 planned tree removal and insertion of an additional architectural element (carpark) in the landscape has the potential to negatively impact on the heritage and architectural value of the entire site, undermine the Eastern Precinct Development and isolate the main building in the landscape. 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.

In addition, the Institute does not believe that the current development application has appropriately considered the Moral Rights of Eastern Precinct architect Johnson Pilton Walker. There is no evidence that amendments to the plan from hard landscaping to a 'green roof' deals adequately with concerns or documents an agreed solution from a Moral Rights perspective.

¹ 2011 Sir Zelman Cowan Award for Public Architecture, AIA National Architecture Awards, 2011 Canberra Medallion, ACT Architecture Awards, 2011 Romaldo Giurgola Award for Public Architecture, ACT Architecture Awards, 2011 CCAA Cement Concrete & Aggregates Australia Public Domain Awards ACT State Winner, 2011 Sustainability Award, MAGNA Museums Australia Awards.

Appropriate review

It is estimated that the car-park extension will cost \$10.8 million, which means that this “stand-alone” Works Application will not be referred to the Public Works Committee. It is the Institute’s view that, given the scale and importance of the \$498.7 million Redevelopment Project and potential cumulative impact on the AWM, the Public Works Committee should have appropriate oversight of all aspects of the redevelopment.

The approach to the development of this proposal by the Memorial, of self-assessment, non-referral and seeking works approval without consideration of the cumulative impact of the wider Redevelopment Project, does not represent best practice heritage management. This is particularly concerning given that the previous development of the Eastern Precinct was handled completely differently, and with award winning results.

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.

ONGOING CONCERNS – ANZAC HALL

Extremely concerning to the Institute and its members has been that the Memorial has widely and very publicly committed itself to a Redevelopment 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. Architects Denton Corker Marshall won the Institute’s prestigious national Sir Zelman Cowen Award for Public Architecture for the building in 2005. At only 18 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 Redevelopment Project. No approvals have been given by the NCA nor the Parliamentary Public Works Committee for the demolition of ANZAC Hall.

There has also been no referral under the *Environment Protection and Biodiversity Conservation Act 1999* to ensure that the proposed use does not have a significant impact on heritage values. To our knowledge there has also been no statutory consultations undertaken with the architects or landscape architects for ANZAC Hall and surrounds in accordance with the *Copyright Act 1968* made by the *Copyright Amendment (Moral Rights) Act 2000*.

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.

The Institute does not believe that it is right and proper, or in line with the NCAs statutory duties to consider any aspect of the redevelopment including the current Works Application or the demolition of ANZAC Hall without reviewing or approving the entire Redevelopment Project.

The \$498.7 million Redevelopment Project should also be considered by the Joint Standing Committee on the National Capital and External Territories. The Institute is very concerned at the lack of scrutiny in the process to date and considers this as contrary to the wider public interest.

FINAL RECOMMENDATION

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

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

The impact arising from both the carpark extension and major redevelopment is significant and should be considered together in a holistic approach. Over development will lead to significant adverse loss of the qualities that make the AWM nationally significant.

The Institute strongly encourages the NCA to utilise an expert design review panel of Institute Gold Medal recipients if and when the Works Approval for the \$498.7 million Redevelopment Project is finally submitted to the authority. There is precedent for this in the process adopted by the NCA for the controversial extensions to the National Gallery of Australia.

The Institute also expects that the NCA will undertake a comprehensive national public and stakeholder consultation, including with national design professional institutes, on any application, including demolition of ANZAC Hall, impact on the Eastern Precinct and any associated site works.

Yours sincerely



Leanne Hardwicke

General Manager Policy, Advocacy and Education