

**BLOCKS 3 AND 5
SECTION 39 CAMPBELL
AUSTRALIAN WAR MEMORIAL
MAIN WORKS**



National Capital Authority

Submission date: 10 September 2021

ABOUT THE INSTITUTE

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

- This submission is made by the Australian Institute of Architects (the Institute) to provide input to the National Capital Authority consultations on the proposal for Blocks 3 and 5, Section 39 Campbell– Australian War Memorial Main Works.
- At the time of this submission campaign spokesperson for the #handsoffanzachall campaign is Clare Cousins, FRAIA Past National President, Australian Institute of Architects, supported by Past President of the ACT Chapter and National President-elect Shannon Battisson.
- The current National President is Tony Giannone FRAIA and the President of the ACT Chapter is Jane Cassidy RAIA.
- The Chief Executive Officer is Julia Cambage.

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1 INTRODUCTION

The Australian Institute of Architects has provided this submission to express our ongoing concerns with the Australian War Memorial's (AWM) Redevelopment Project 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 for Blocks 3 and 5 Section 39 Campbell – Australian War Memorial (AWM) Main Works. 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.

The NCA's crucial role is to ensure that all development within significant areas of the national capital is consistent with the National Capital Plan. This includes, among other points, ensuring that such development:

- is consistent with Canberra's role "as the symbol of Australian national life and values";
- conserves and enhances "the landscape features which give the National Capital its character and setting, and which contribute to the integration of natural and urban environments"; and
- creates, conserves and enhances "fitting sites, approaches and backdrops for national institutions and ceremonies".

It is clear that the AWM Redevelopment Project, including "early works" that are already approved and underway, are inconsistent with the National Capital Plan.

This is evident despite the NCA approving the demolition of the award-winning Anzac Hall and the removal of 140 trees as part of an "early works" program. This is even though the consultation process resulted in a record 601 submissions from the community, of which only 3 supported the redevelopment proposal in its current form.

In response to the decision, #HandsOffAnzacHall campaign spokesperson and former National President of the Australian Institute of Architects, Clare Cousins said:

“Australia’s regulatory framework has failed Australians at every step of this abomination of an ‘assessment’ process. Supposedly ‘independent’ decisionmakers have been shown to be nothing more than toothless tigers dancing to the tune of their political masters.”

“Expert advice on the significant negative heritage impacts to the AWM from demolishing Anzac Hall, as well as widespread community opposition, have been equally ignored.”

“The Environment Minister, the Parliamentary Public Works Committee and now the NCA have together created an abysmal precedent that endangers every other piece of public architecture in this country.”

2 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 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 like 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 acknowledge the contribution of Anzac Hall to the precinct. Given time, it is extremely likely that Anzac Hall would have obtained 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.

Designed by Denton Corker Marshall (DCM) and opened in 2001 at a reported cost of \$11.3 million, Anzac Hall was lauded for its sensitivity to the heritage and cultural context of the Memorial while also providing functional design. Anzac Hall was 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 an enormous 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 was also not appropriate from an environmental or sustainability standpoint to undertake the demolition.

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

The Institute would like to reaffirm our view that 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 has continued with the NCA working with the Memorial to hide the demolition of Anzac Hall as “early works” and again in the current Works Approval documentation.

The Institute maintains that to fast track the demolition of Anzac Hall ahead of assessment of the AWM Redevelopment Project for consistency with the National Capital Plan, and if the project should even proceed as designed, has been 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 approve the demolition of Anzac Hall separately from consideration of the Redevelopment Project as a whole.

We are now critically and equally concerned about the consequences for other icons now that the Memorial a preeminent national institution, has been permitted to disregard its heritage obligations and commitments to the National Capital Plan by the NCA.

3 HERITAGE IMPACTS

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 has been critically undermined now that such a blatant violation of the Heritage Management Plan for such an iconic site has been permitted to proceed.

As the NCA well knows, 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 would – unequivocally – have a significant negative impact on the AWM’s heritage value. Even the Heritage Management Plan that was included in the current “early works” documentation 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.

In the current Works Approval only one page is devoted in the supporting documentation to heritage considerations and relies on the statement “the Memorial is confident the outcome is sensitive to the heritage of the institution and an asset to Australia”. This is incredible given that every heritage process to date has confirmed that the loss of Anzac Hall means this cannot be achieved.

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 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 also expressed its opposition to the Redevelopment Project.

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 Memorial 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 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 NCA is now complicit in this ongoing failure of due process.

4 PUBLIC CONSULTATION AND COMMUNITY SUPPORT

The public consultation process has been a 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 continued with the NCA allowing the Memorial to hide the demolition of Anzac Hall in the “early works” application.

Throughout the EPBC documentation and again during the NCA process, the Memorial continues to consistently downplay criticisms of its plans and overstates support. Concerningly, the Memorial consistently 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.”*

The Memorial continues to use exactly the same arguments in the current Works Approval documentation. However, a copy of the presentation used by the Memorial and the survey questionnaire 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, or on the cumulative impact of the project on the Memorial. 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 Memorial 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 and that 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 the need for the redevelopment at all.

In the face of what has been widespread opposition to the redevelopment plans it seems clear that the Memorial has sought to reverse engineer its consultation process to meet a

pre-determined outcome. The NCA continues to allow this to occur. For example, in the current Works Application supporting documentation it is not mentioned in Section 13.4: National Capital Authority Early Works Application Consultation, that more than 600 submissions called for the project to be stopped in its current form, and only two supported it proceeding.

In the section referencing the Public Works Committee process, it also fails to mention that the Committee issued a dissenting report recommending that the government “consider alternative approaches that do not involve the complete demolition of the existing Anzac Hall.”

5 MORAL RIGHTS

The current Works Application supporting documentation in Section 14: Copyright Amendment (Moral Rights) Considerations, outlines the process to allow architects Denton Corker Marshall (DCM) to make a record of Anzac Hall and consult with the Memorial. The documentation does not mention that the demolition of Anzac Hall has already commenced and does not confirm that DCM was indeed given this opportunity. The documentation states that “no response has been received from DCM” but this is again disingenuous. How has the Memorial meaningfully engaged with DCM to discuss the Redevelopment Plans and to allow Anzac Hall to be documented before demolition?

In fact, DCM learnt about the planned demotion of Anzac Hall along with the rest of the Australia when it was announced by the Prime Minister in 2018 as a fait accompli, and without assessment or consideration by any planning or approval process and in contravention of the Heritage Management Plan for the Memorial site.

Recently DCM asked the following statement to be made at the community led Candlelight Rally held for Anzac Hall on 20 June 2021 and again to the Institute membership, National Council and Board:

In October 2018, the announcement by the Australian War Memorial (AWM) to demolish Anzac Hall came as a shock.

Designed by Denton Corker Marshall some 20 years ago, Anzac Hall was conceived as an integral part of a composition with Emil Sodersten’s original memorial building.

Anzac Hall’s siting, symmetrical arrangement and light connection to the War Memorial are deferential to its historic counterpart. Together they form an integrated ensemble.

The 1941 building is heritage listed. The 2001 Anzac Hall extension won the highest award for public architecture in Australia, the Sir Zelman Cowen Award. This recognition forms part of Australia’s contemporary architectural heritage.

Denton Corker Marshall believes the AWM is first and foremost a solemn memorial, and only after that a war museum.

We would like to thank the Australian Institute of Architects for establishing the ‘Hands off Anzac Hall’ campaign, and the members of the public, especially those who contributed to the record 600 submissions to the NCA that opposed the redevelopment.

It is quite likely that the only communication from the Memorial with DCM has been through sending proforma legal documentation. Again, this process is insufficient and an incredibly poor consultation and engagement process that the Memorial should be embarrassed by.

6 FINAL COMMENTS

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, the Institute opposes 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 that we have been asking is that it be done in the right way. The earlier consideration of the demolition of Anzac Hall separately from consideration of the Redevelopment Project as a whole ensures that there is now no way for this to occur.

It is not right and proper, or in line with the NCAs statutory duties to consider any aspect of the Redevelopment without reviewing or approving the entire Project. The NCA has failed in its mandate to protect the National Capital Plan, and the loss of DCMs Anzac Hall is the irreplaceable outcome.

The question now for the NCA is whether it is appropriate under the National Capital Plan, for the Australian War Memorial to be transformed in the way currently described in this Works Approval application. The Institute would counter that the significant cumulative heritage impacts, and loss of Anzac Hall means that it is not.

