

Additional Heritage line area advice on Australian War Memorial redevelopment – 21/09/20 To be read in conjunction with Heritage line area advice 9/12/19	
Impact of Demolition of the Original Anzac Hall	<p><u>ADVICE UNCHANGED</u></p> <p>The demolition of Anzac Hall will have a direct, permanent impact on the National Heritage values of the AWM. Mitigation measures proposed include archival recording of the building before demolition.</p> <p>The proposed demolition of Anzac Hall will have a permanent, high intensity impact which destroys the ability of Anzac Hall to demonstrate these heritage values as it will no longer be present on the site. This will result in an element of the values under NHL (e) being lost. Other elements will continue to demonstrate other aspects of this value.</p>
Impact of New Anzac Hall	<p><u>UPDATED ADVICE</u></p> <p>Throughout consultation, the roof height of the New Anzac Hall has been reduced by 750mm, however the building remains above the parapet height of the main building and may still be visible within the Parliament House Vista.</p> <p>The impacts of the new Anzac Hall are predictable and will be reduced to a degree by the fact that it is replacing an existing building which plays a similar role in the landscape, and by the architectural design of the new building. However, the new Anzac Hall will be larger than the existing Anzac Hall, meaning its effect on the ceremonial landscape will be increased. New Anzac Hall will have a permanent, low-moderate impact on the overall setting of the AWM due to its increased size and height.</p>
Impact of the Glazed Link	<p><u>UPDATED ADVICE</u></p> <p>The original proposed Glazed Link design required physical intervention into the fabric of the main memorial building. Throughout consultation, the design has been altered to ensure the construction's 'reversibility' (ie: it can be removed without damaging the main building fabric) which will reduce the impact of the Glazed Link to an acceptable level in terms of the original heritage fabric.</p> <p>The original proposed roof height of the Glazed Link sat above the parapet line of the Memorial and was visible within the Parliament House Vista. Throughout consultation, the ETFE roof has been reprofiled to sit lower than originally proposed and to follow the northern profile of the main memorial building rather than sitting above it and obscuring the parapet. Combined, this will reduce the Glazed Link's impact to an acceptable level on the Parliament House Vista heritage values; from both the north and south.</p> <p>The NHL (e) values note the Memorial's 'relative visual isolation' in the landscape. There have been no mitigation measures provided to address the impacts from building accretions (such as the Glazed Link abutting the memorial) on the Memorial in its landscape setting. The construction of the Glazed Link will still have a semi-permanent, high intensity impact on the Memorial's 'visual isolation in the landscape'.</p> <p>Overall, despite the changes made, the Glazed Link will still have a predictable, semi-permanent, high intensity impact on the heritage values of the AWM. This is because the ability to interpret the heritage values of the Memorial's 'relative visual isolation' through the Glazed Link's fabric will still be obscured to a moderate degree. This value will not be lost; however, it will become harder to interpret within the AWM setting.</p>

<p>Impact of the New Southern Entrance (glass lift)</p>	<p>UPDATED ADVICE</p> <p>During consultation a glass lift was added to the external landscape of the New Southern Entrance. Concerns were raised over potential reflection and glare from the glass impacting on the heritage values of the Parliament House Vista and those of the AWM related to the Memorial’s aesthetic value in the landscape. While the PD documentation (p.65) states that the lift is outside of the Parliament House Vista; as a heritage listing that is ‘view-based’, the values have the potential to be impacted by anything visible within that view (from any point along the view). The glass lift within the New Southern Entrance falls within the Parliament House Vista when viewed from the south.</p> <p>The consultation process resulted in a commitment to screening the glass lift with vegetation to ensure it cannot be seen within the Parliament House Vista. <u>If the vegetation is maintained over the long term</u>, this will reduce the impact of the glass lift somewhat on the heritage values of the Parliament House Vista.</p> <p>The consultation process resulted in a commitment to the lift car automatically returning to the lowest level when not in use. This will reduce the visual intrusion somewhat, however, will not reduce the impact of the overall structure of the lift.</p> <p>The glass lift within the New Southern Entrance will still have a permanent, moderate impact on the aesthetic heritage values of the AWM in its setting as it will not be able to be screened from all angles within the landscape.</p>
<p>Impact of the New Southern Entrance (oculus)</p>	<p>UPDATED ADVICE</p> <p>The proposed oculus design element in the New Southern Entrance adds unnecessary visual clutter at the entrance to the Memorial due to its materiality (glass, handrail and stone kerbing). Visual clutter in front of the Memorial will act as a distraction from the Main Building’s monumental nature and impact on the heritage values of the Parliament House Vista.</p> <p>During consultation, the kerbing was reduced in height somewhat and the handrail ‘flattened’ in profile to be less visible.</p> <p>The changes in design will reduce the oculus’ impact on the heritage values of the Parliament House Vista when viewed from afar to an acceptable level. However, the oculus will still have a permanent, moderate impact on the heritage values of the AWM when viewed from within the landscape setting of the AWM (short to medium views within the landscape). The Main Building’s monumental nature will not be lost; however, it will become harder to interpret within the AWM setting.</p>
<p>Impact of the development as a whole</p>	<p>UPDATED ADVICE</p> <p>The proposed redevelopment will add an additional 24,277m² of internal space to the AWM. This added internal space will be for exhibition; event; circulation and amenity uses.</p> <p>The importance of the balanced relationship between the building, the collections and the commemorative spaces is recognised as a heritage value under both CHL (b) and NHL (b). These heritage values will be impacted by the addition of several large new spaces which will be focused primarily on exhibition of collections, visitor services and functions and events. In this arrangement, the original building’s significance is reduced, as is the significance of the commemorative spaces. This significance is reduced both by the increased scale of exhibition spaces relative to the size of the site as a whole, which outweighs and pulls focus from the commemorative spaces, as well by as the physical impacts to the building and commemorative spaces occurring to facilitate the creation of exhibition spaces.</p>

Despite the changes made during consultation, the development as a whole will still have a large scale, high intensity, permanent impact on the heritage values of the AWM by reducing the relative scale of the ceremonial spaces within the landscape.

Original referral advice noted that the action is potentially inconsistent with Heritage Management Principle 4 and 5.

During consultation, AWM committed to and undertook extensive stakeholder consultation and this has been reflected in the final PD. The proposal is now consistent with Heritage Management Principle 5.

Despite the changes being made, the use of the place as a memorial will not change. Therefore, the proposal is not inconsistent with Heritage Management Principle 4.

Referral Advice Template

The Australian War Memorial (AWM) is proposing to undertake major redevelopment works to the Memorial and its surrounds. The details of the redevelopment project works will be explored further throughout the advice, however, the main elements of the redevelopment project include the following:

- Construction of a new southern entrance and development of new lower level
- Temporary removal of the Memorial's front façade
- Reconfiguring the existing Parade Ground
- Demolition of the existing Anzac Hall and construction of a new, larger Anzac Hall
- Construction of a new glazed courtyard between Anzac Hall and the main Memorial building

The AWM want to conduct the redevelopment work to expand its museum display space, provide further visitor facilities, improve on its disability access and increase overall visitor capacity.

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|---|---|--|
| <input type="checkbox"/> World Heritage property | <input checked="" type="checkbox"/> National Heritage place | <input type="checkbox"/> Commonwealth marine area |
| <input checked="" type="checkbox"/> Commonwealth land | <input checked="" type="checkbox"/> Commonwealth Action | <input type="checkbox"/> Other whole of environment matter |

National Heritage place

The Australian War Memorial's heritage values are recognised through its listing on the National (Place ID 105889) and Commonwealth (Place ID 105469) Heritage Lists. The Australian War Memorial is also part of the Parliament House Vista Commonwealth Heritage place (Place ID 105466). In addition to the official listings, all heritage values at the site are protected as part of the environment on Commonwealth land and as part of the environment where Commonwealth agencies are conducting an action.

AWM and Memorial Parade National Heritage Listing

Under the National Heritage Listing, the AWM and Memorial Parade is listed under criteria a, b, c, e, g and h. The official National heritage values are listed below. Sections of the values particularly relevant to this referral are highlighted.

Criterion A (Events, Processes)

The AWM is an outstanding national museum and memorial, as expressed through the main building, the courtyard fabric, interior spaces, the Sculpture Garden and the collections. The AWM was established as a direct consequence of the First World War, one of the seminal events in Australian history. It embodied the vision of Charles Bean – Official First World War correspondent – that the war would be instrumental in creating a sense of nationhood and a distinctly Australian identity. The institution plays a pivotal role in helping Australians to commemorate and understand the sacrifice and loss of Australians during war.

The AWM together with Anzac Parade is an important national icon. Its major features include: the main building; the medieval stone lions at the entrance; the ceremonial landscape including the Lone Pine tree; and displays and sculptures. The AWM and Anzac Parade are major venues for national commemorative services and events such as the ANZAC Day march.

Anzac Parade, as part of the Parliamentary Vista and an extension of the AWM, is part of one of the major designed landscapes of Australia. A ceremonial space of this grandeur is unique in Australia.

The AWM and the memorials along Anzac Parade represent changing concepts of commemoration in Australia, influenced by the armed forces and community groups. The Hall of Memory with the Tomb of the Unknown Australian Soldier, and aspects of its setting are notable.

Criterion B (Rarity)

The AWM building is a purpose built repository, reflecting the integral relationship between the building, commemorative spaces and the collections. This is unique in Australia and rare elsewhere in the world. The values are expressed in the fabric of the main building, the entrance, the Hall of Memory, the collections and the surrounding landscape.

The AWM collection contains unique objects including a Lancaster bomber and the largest collection of Victoria Crosses in the world. The building contains rare elements, notably the medieval stone lions at the entrance and the Hall of Memory with its largest mosaics in the world.

Anzac Parade, as part of the Parliamentary Vista and as an extension of the AWM, is part of one of the major cultural landscapes of Australia. The grandeur of the ceremonial space is not found elsewhere in Australia. Anzac Parade is nationally important for its public and commemorative functions.

Criterion C (Research)

The AWM has a unique and important function in the nation in collecting and displaying objects and records on Australians' experience of war. The AWM and other institutions have used these materials to produce research on social, political and military history. The place has the potential to yield further substantial information on Australians' experience of war. These values are expressed through the collections.

Criterion E (Aesthetic characteristics)

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 and Services League of Australia). The place has evoked strong emotional and artistic responses from Australian and overseas visitors. 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.

The AWM together with Anzac Parade form an important national landmark that is highly valued by the Australian community. As part of the Parliamentary Vista, the AWM makes a major contribution to the principal views from both Parliament Houses and Mount Ainslie. Views from Anzac Parade to the Hall of Memory, and from the Hall of Memory along the land axis are outstanding. Its prominent position is important due to its relative visual isolation on the Griffin land axis, amid the backdrop of the forested slopes of Mount Ainslie. The visual impact of the AWM when viewed from Parliament House and other points along Griffin's land axis including Mount Ainslie; and the fabric of Anzac Parade including the memorials, plantings and lighting is far more distinctive and dramatic compared to the other principal war memorials in Australia.

Criterion G (Social Values)

The AWM is the national war museum and national shrine, and together with Anzac Park, has special associations for the Australian community, particularly veterans and their families. These special associations are reinforced on ANZAC Day and at ceremonies specific to particular memorials on Anzac Parade. The AWM and the Anzac Parade memorials are the nation's major focal point for commemoration including the ANZAC Day march and other ceremonies and events. These values are expressed through: the AWM building (including the Hall of Memory); the collection; the surrounding landscape (including the Sculpture Garden); and Anzac Parade including the memorials.

Criterion H (Significant people)

The AWM building and the Anzac Parade memorials have special associations with Australia's military forces and veterans represented by the Returned and Services League of Australia.

The AWM's success as a shrine, a museum, an architectural form and part of Canberra's urban plan is partly the result of its special associations with the lives and works of people who have been significant in Australia's history. These include the AWM's founders Charles Bean, John Treloar and Sir Henry Gullett.

The values are expressed in the fabric of the place which includes: the main building; the Hall of Memory; the collections; the surrounding landscape; and Anzac Parade.

AWM Commonwealth Heritage Listing

Under the Commonwealth Heritage Listing, the AWM is listed under criteria a, b, d, e, f, g and h. The official Commonwealth heritage values are listed below.

Criterion A (Processes)

The AWM is Australia's National Shrine to those Australians who lost their lives and suffered as a result of war.

Attributes: The whole building, setting and contents that illustrate Australia's historical involvement in war.

Criterion B (Rarity)

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.

Attributes: The equal relationship between the building, the collections of objects and records and the commemorative spaces.

Criterion D (Characteristic values)

The building is one of Canberra's earliest major examples of Australian Art Deco architecture, with fine examples of applied art in the same style. The building's design also successfully fulfils its special functions and reinforces the role of the place as a Shrine.

Attributes: Its architectural styling and design, plus its applied art.

Criterion E (Aesthetic characteristics)

The AWM is an important landmark in Canberra, Australia's National Capital. As the terminating building at the northern end of the land axis of Griffin's city design and one of only three buildings sited on the axis, the AWM makes a major contribution to the principal views from both Parliament Houses.

Attributes: Its location as the terminating building at the northern end of the Land Axis.

Criterion F (Technical achievement)

The success of the AWM 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. The role of the AWM as a National icon is reinforced by its central location in the nation's capital.

Attributes: Its distinctive massing and symmetry; its prominent siting on the Land Axis, its landscaped grounds and its setting against the backdrop of the forested slopes of Mount Ainslie.

Criterion G (Social value)

The AWM is Australia's National Shrine to those Australians who lost their lives and suffered as a result of war. As such it is important to the Australian community as a whole and has special associations with veterans and their families and descendants of those who fought in wars.

Attributes: The whole building, including its commemorations, displays and records.

Criterion H (Significant people)

The AWM has special associations with veterans and their families and descendants of those who fought in wars.

The Memorial's success as a shrine, an architectural form and as part of Canberra's urban plan results in part from special associations with the lives and works of a number of individuals whose activities have been significant in Australia's history. These include the Memorial's founders Charles Bean, John Treloar and Henry Gullett; architects Emil Sodersteen and John Crust; and M Napier Waller who created artworks for the building.

Attributes: The whole building, including its architectural design, its setting, its commemorations, its artworks, displays, memorabilia and archival records.

Parliament House Vista Commonwealth Heritage Listing

The AWM is the northern apex of the Commonwealth Heritage Listed place - Parliament House Vista. Under the Commonwealth Heritage Listing, the Parliament House Vista is listed under criteria a, e, f, g and h. Portions of the official Commonwealth heritage values that are relevant to the AWM are listed below.

Criterion A (Processes)

The area has been associated since 1941 with the development of Australian cultural life and national identity through the presence of such institutions as the Australian War Memorial, the National Gallery of Australia, the National Science and Technology Centre and the National Library of Australia. The national cultural institutions reinforce the national character of the area and are an important symbolic group in Australia's national cultural life. The AWM and Anzac Parade memorials and, to a lesser extent, the other memorials have and continue to play a very important role in fostering aspects of national identity, in particular the AWM through its role as a National Shrine for all Australians.

The vista landscape is significant for its richness of features. Many places in the Vista area have individual heritage significance for their architectural design and historic importance. These include Old Parliament House and Curtilage, East Block Government Offices, West Block and the Dugout, John Gorton Building, the National Library of Australia, the High Court of Australia, the National Gallery of Australia, Blundells Farmhouse, Slab Outbuildings and Surrounds, the AWM, the Portal Buildings, The High Court - National Gallery Precinct, the Carillon, and King George V Memorial.

Attributes: The concentration of buildings, parklands and gardens that support Commonwealth parliamentary and governmental activity as well as, to some extent, national cultural life. These include Old Parliament House and Curtilage, East Block Government Offices, West Block and the Dugout, John Gorton Building, the National Library of Australia, the High Court of Australia, the National Gallery of Australia, Blundells Farmhouse, Slab Outbuildings and Surrounds, the AWM, the Portal Buildings, The High Court - National Gallery Precinct, the Carillon, King George V Memorial, Sculpture Garden of the National Gallery, the National Rose Gardens, Commonwealth Park, the Peace Park, the Lakeshore Promenade and Kings Park and the Aboriginal Embassy site.

Criterion E (Aesthetic characteristics)

The place has high aesthetic significance due to the visual impact of the extensive open sweeping vista along the land axis that can be experienced in two directions, the designed axes set within natural features of forested hills, patterns and textures of architectural massing accentuated by planned open spaces, water planes and tree plantings that are arranged across the area. The vista is significant for its visual drama with its ability to engage viewers in the visual perspective of the sweeping vista to the

terminal features. The aesthetic significance is also a result of the large scale qualities of the axes, including the open green spaces, combined with patterns and symmetrical characteristics of the road networks and numerous designed smaller attributes.

Attributes: The extensive vista along the land axis, the forested hills, patterns and textures of architectural massing accentuated by planned open spaces, water features and tree plantings, art works, the terminal features plus the interplay of scale and texture in the designed landscape.

Criterion F (Technical achievement)

The Parliament House Vista is the central designed landscape of Canberra that expresses the core of the Walter Burley Griffin design vision for Canberra. It is highly significant for its symbolic representation of the democratic interchange between the people and their elected representatives and its use of the natural landforms to generate a strong planning geometry. It expresses a masterly synthesis and ordering of topographical features and administrative functions to meet the needs of a national capital. The vista landscape embraces the central land axis and part of the water axis and most of the Parliamentary Triangle including the area known as the Parliamentary Zone. The significance incorporates Walter Burley Griffin's vision for the area, as the focus of Commonwealth parliamentary and governmental activity as well as national cultural life. This vision has been partly realised and the place is the setting for major, government, judicial and cultural institutions. The northern extent of the vista of Anzac Parade and the AWM, despite differing from the original plan, are significant for memorial purposes developed in response to the needs of the people. Despite being modified to a lesser degree to accommodate the impact of wars on Australians, the Vista now presents as a philosophical concept expressed in urban planning, landscape and architecture, to achieve a grand vision of a symbolic, unified and visually dramatic place.

The Parliament House Vista incorporating the central national area, is the core of the most ambitious and most successful example of twentieth century urban planning in Australia. It is important for its design pattern with large landscape and waterscape spaces with their enframement by treed avenues and at the lake by bridges, the terminal vista features of the AWM and Mount Ainslie at the northern end and Parliament House at the southern end, with the Carillon and Captain Cook Jet creating balanced vertical features in the water plane.

Many places in the Vista area have individual heritage significance for their architectural design and historic importance. These include Old Parliament House and Curtilage, East Block Government Offices, West Block and the Dugout, John Gorton Building, the National Library of Australia, the High Court of Australia, the National Gallery of Australia, Blundells Farmhouse, Slab Outbuildings and Surrounds, the AWM, the Portal Buildings, The High Court - National Gallery Precinct, the Carillon, and King George V Memorial.

Attributes: The whole of the vista, including all elements and features contained within it, as well as the natural wooded hills beyond.

Stage: referral**Previous Decisions:**

The AWM has previously submitted several referrals for actions, including:

- 2008/4629 Australian War Memorial/Tourism and recreation/Treloar Crescent, Campbell/ACT/Eastern Precinct Development and National Service Memorial. Referral decision: Not controlled action (<http://epbcnotices.environment.gov.au/entity/annotation/69e95bd2-8e69-e511-a947-005056ba00a8/a71d58ad-4cba-48b6-8dab-f3091fc31cd5?t=1575345383528>)
- 2006/2829 AUSTRALIAN WAR MEMORIAL/Tourism and Recreation/Canberra/Australian Capital Territory/Gallery Development, Stage 2. Referral decision: Unknown
- 2005/2379 AUSTRALIAN WAR MEMORIAL/Tourism and Recreation/Campbell/Australian Capital Territory/Temporary display of bridge sections from HMAS Brisbane. Referral decision: Not controlled if undertaken in a particular manner (<http://epbcnotices.environment.gov.au/entity/annotation/b4ca4627-c968-e511-b93f-005056ba00a7/a71d58ad-4cba-48b6-8dab-f3091fc31cd5?t=1575345755250>)
- 2004/1731 Australian War Memorial/Tourism, recreation and conservation management/Canberra/ACT/construction of new admin bldg. Referral decision: Not Controlled (<http://epbcnotices.environment.gov.au/entity/annotation/57e14fd4-c168-e511-b93f-005056ba00a7/a71d58ad-4cba-48b6-8dab-f3091fc31cd5?t=1575345861821>)
- 2004/1353 Australian War Memorial/Tourism, recreation and conservation management/Canberra/ACT/Bomber Command Memorial. Referral decision: Not controlled (<http://epbcnotices.environment.gov.au/entity/annotation/d236bd9e-be68-e511-b93f-005056ba00a7/a71d58ad-4cba-48b6-8dab-f3091fc31cd5?t=1575345935745>)

Nature and extent of impacts on heritage matters as a result of the proposed action

The AWM is situated in a prominent location at the base of Mt Ainslie in Campbell, Canberra and is bounded by Fairbairn Avenue, Limestone Avenue and Treloar Crescent. The AWM complex is comprised of several buildings, including the Main Memorial Building, ANZAC Hall, the CEW Bean Research Centre, Poppy's café and the administration building, landscaped surrounds, large technology objects and carparks. The heritage significance of the AWM is recognised through its National and Commonwealth Heritage values. The AWM is also the north-eastern apex of the Parliament House Vista Commonwealth Heritage Listed Place. The AWM is also a Commonwealth agency with the responsibility for managing and the operation of the Memorial.

The proposed redevelopment works for the AWM are extensive and include a series of new builds, demolition of existing builds and reconfiguration of existing features. Most of the proposed activities will have direct and long-term impacts, though some impacts will be indirect and temporary. The nature and the extent of the impacts will be discussed through examining each major element of the redevelopment works, as well as considering the impact of the action as a whole.

Documents taken into account in the below assessment of impacts include the Referral Document, and the Heritage Impact Assessment prepared by the proponent. The 2011 Heritage Management Plan for the site has been used to provide further information that assists in the assessment of impacts.

Impact of Southern Entrance Works

The proposed new Southern Entrance is proposed to be built below the existing forecourt. It is proposed that this will be the primary entrance into the Memorial with the current main entrance to be retained but to only be used for ceremonial purposes. The new proposed southern entrance is more than a simple entrance into the main Memorial building and will include a new subterranean level for the Memorial. It is proposed that this new level will host visitor facilities including security screenings, cloakroom facilities, toilets, lifts, as well as larger areas for a 250-person theatre, corporate function areas and additional gallery space.

The associated works and details of the new Southern Entrance includes (see pg 103 and 104 of HIA):

- Entrance will be flanked by two sunken approaches from the eastern and western arrival courtyards.
 - The western arrival courtyard will be ramped to ensure disability accessibility.
 - The eastern access will have stepped access from the ground level with ramped and lift access to the underground carpark.
- The design of the Southern Entrance will be built into a Bounding Wall. The Bounding Wall will act as a backdrop to the Stone of Remembrance.
- Two new stairwells and lifts to be constructed inside the new Southern entrance to provide access to the main Memorial.
- Two skylights to be installed in the roof of the main Memorial building.
- The temporary removal of the existing staircase during construction and replaced on completion.
- Construction of a central Focal Nexus that will sit in line with the Hall of Memory, The Tomb of the Unknown Soldier, the Pool of Reflection and the Stone of Remembrance. Guiding arced walls will also be constructed to draw people towards the Focal Nexus.
- Structural support work of the main Memorial façade.
- Support beams over the new Level 1 entrance stairs.
- New steel support beams will be installed at Level 2 to support the spiral staircases.
- Removal of non-remnant trees including the Queen's Tree.

The proposed mitigation measures for the Southern Entrance includes:

- Southern Entrance design is consistent with the overall symmetrical design of the AWM.
- Introduction of a 2 m heritage protection zone along the interface of the main Memorial building front façade – ensuring no excavation will occur within 2 m of the front façade.
- New builds to be constructed with high quality material and achieve high design excellence.
- Engage the service of an experienced and well-recognised architect to develop a detailed design of the new build.
- Introduction of new sandstone elements should match existing sandstone of the main Memorial building and should be sourced from the same quarry or within same region.
- Granite pathing for the New Southern Granite should match existing 'Christmas bush granite'.
- Monitor structural movement and vibration during bulk excavation and construction works, and include contingencies plans.
- Ensure landscape works compliment the new entrance.

The proposed Southern Entrance works will have permanent and direct impacts on the heritage values of the Australian War Memorial. These impacts will be of low frequency, as a one-off intervention, but will be of a large scale and high intensity.

Impacts from Construction Risks

There is a potential risk of a high impact on the heritage values of the site associated with the major structural works. The removal of the existing main entrance will occur during construction – this is a major physical intervention but is theoretically a temporary impact. In the instance that engineering and architectural precautions are insufficient or unexpectedly fail, the excavation and physical works to the building, including removal of the main entrance and cut outs alongside the façade could cause permanent damage to the physical fabric. The scale of this damage could vary from small physical issues from vibration etc to serious structural failure. A number of measures have been proposed to avoid these impacts, including an exclusion zone, as well as qualified architects and engineers. While the potential impacts are severe, the likelihood of them occurring has been mitigated to a large degree. As such, a precautionary approach would not expect that this aspect of the action is likely to permanently destroy the National and Commonwealth Heritage values of the AWM, but monitoring of any risks will be essential.

Impacts from Alterations to Original Heritage Fabric

By removing and altering original physical fabric of the AWM to allow for the construction of the Southern Entrance, this part of the action will diminish the ability of the site to demonstrate its National and Commonwealth Heritage values as a memorial created in response to World War I which “embodied the vision of Charles Bean” (criteria a). The fabric of the building is recognised as being of significance under multiple National and Commonwealth Heritage values for its contribution to telling this story, under criterion (a) of both listings. Alteration of this original fabric, eg: installation of skylights, new stairwells and lifts, will therefore reduce the ability of the AWM to express these heritage values, due to the change in its original design. Mitigation measures include that the introduction of new material *should* match the existing the material (such as the sandstone should ideally be sourced from the same Wondabyne quarry and the granite pathing should match the existing Christmas bush granite), however, there is no certainty articulated in the HIA that this will occur. The HIA (pg. 130-131) only states that stone should “ideally” be sourced from the same quarry or region. The Southern Entrance is only one part of this design, so in isolation the scale of these impacts in terms of physical alteration to the original fabric affecting the ability to understand the original design of the building are moderate. However, in combination with other alterations the impacts increase, and the impacts to original fabric are high. This is discussed below in **Overall Impacts**.

The new Southern Entrance will also impact on the heritage values of the AWM as an example of the principal characteristics of Art Deco architecture in Australia, as recognised under criterion (d) of the Commonwealth Heritage listing. The Commonwealth Heritage values recognise that the AWM is “one of Canberra’s earliest major examples of Australian Art Deco architecture”. The History section of the Commonwealth Heritage Listing contextualises this, stating that the main building displays Art Deco features including “a front entrance showing Egyptian influences in its pylons and massing” and “a monumental entrance”. The front of the Southern Entrance as observed when standing in front of it will have a number of vertical stellas progressing east and west either side of the lower central steps, interspersed with glass. These additional new features will distract from the monumental nature of the main entrance. The new paved area in front of the main entrance and the sunken approaches on the east and west will also reduce the sense of monumentality of the main entrance. These impacts will be of one-off frequency, but will be permanent once constructed. In terms of the scale of the impact on the ability of the site to address its Art Deco heritage overall, this is moderate, considering the Art Deco features of the main entrance remain. They

will rather be impacted in an indirect way by the new additions drawing focus away from the entrance. The main mitigation measures to reduce these impacts are through the design choices made; nevertheless these additions will obscure the architectural heritage values of the AWM to a moderate degree.

Impacts from the changed nature of the main entrance

As well as the physical impacts to fabric of the Southern Entrance works, the proposed action will impact the National and Commonwealth heritage values of the AWM through the change in nature of the entrance. The AWM functions as a shrine and place of remembrance. The physical design of the AWM facilitates this experience for visitors, which is a highly important intangible heritage value. The progression up the original entrance, past the medieval stone lions and into the central courtyard and other commemorative spaces is a designed sequence to bring visitors through an equivalent emotional progression from the exterior into spaces of reflection and commemoration, preparing them to then experience the rest of the AWM's collection. The significance of these elements of the design are recognised in particular under criterion (a) and (e), with (e) stating that "the place has evoked strong emotional and artistic responses from Australian and overseas visitors". These values are contextualised by information in the History section of the National Heritage Listing, which describes major commemorative spaces as including the "the grand entrance", emphasising its importance. Criterion (d) of the Commonwealth Heritage values also recognises that "the building's design also successfully fulfils its special functions and reinforces the role of the place as a Shrine."

The new design for the Southern Entrance will detract from the primacy of the main entrance and therefore highly obscure the ability of the site to demonstrate its heritage values as an important memorial space for Australians, by limiting their ability to interact with the AWM as a designed commemorative experience as intended. The Referral Document states that "the existing forecourt and stairs would be used as a secondary entrance primarily for ceremonial purposes" (p 1) and the HIA states at pg 103 "the intent of the stairwells is to circulate visitors to the Courtyard and Roll of Honour as per the existing main entrance to the main Memorial building". This proposal will be a permanent and long term impact on the National and Commonwealth Heritage values of the AWM as it will prevent the Australian community from experiencing the National and Commonwealth Heritage values of a site designed to serve all Australians. Instead only a limited section of the community will have access to the entrance on ceremonial occasions – this is generally inconsistent with all of the AWM's protected values, but in particular criterion (g) which recognises that the AWM has special associations "for the Australian community". Visitors will be directed to the subterranean Southern Entrance and will be unable to experience the emotional response created by the design of the AWM. Instead they will come through the Southern Entrance and first encounter galleries and function spaces, then enter the Main Building through the two new stairwells to be constructed. This will undermine the National and Commonwealth Heritage values of the AWM in terms of the way the entrance experience is specifically designed to start with a commemorative space to emotionally prepare people to progress to the rest of the exhibition spaces and collections. The proposal for a tunnel from the visitors' carpark to the Southern Entrance would exacerbate this; further information on the presence of this tunnel and its scope would assist in the assessment of impacts. No mitigation measures for these impacts are proposed in the HIA (see pg 130), and overall the impacts from the changed nature of the main entrance will be of a high degree.

Impacts on the Parliament House Vista

In addition to the experience of entering through the main entrance, the proposed Southern Entrance works will potentially impact on the Parliament House Vista. Under Criterion (e) of the National Heritage values, views “from the Hall of Memory along the land axis are outstanding”. The open nature of the main entrance contributes to this view (as can be seen in [this image](#) through the central lower arch).

Firstly, visitors will be directed into the Main Building via the new internal stairwells. This will prevent them from having the experience of entering up the stairs of the Main Entrance and immediately being able to experience the vista along the Parliamentary land axis from the top of the stairs, an intentional designed experience which contributes to a sense of ceremony and grandeur that prepares people for the emotional experience of visiting the War Memorial.

Secondly, the nature of the permanent closure of the original entrance may reduce this view; this would likely be to a lesser degree as the majority of the visibility of the view remains. However, further information on the exact plans for how and when the original entrance will be closed would allow for a clearer understanding of impacts. This is not addressed in the referral documentation. In addition, the views from Anzac Parade to the War Memorial along the land axis are significant, and Criterion (f) of the Commonwealth Heritage values recognises the importance of the AWM’s “relative visual isolation given its privileged siting on the land axis”. Visual clutter in the design of the Southern Entrance could distract from this isolation of the main building. The low profile design for the new entrance reduces the impact on these heritage values to a lower scale, but the new entrance will still obscure these heritage values to an extent.

Conclusion

The majority of the potential impacts are predictable and manageable. However, the proponent is not undertaking mitigation measures or management activities for all potential impacts, only some. Proposed mitigation measures are targeted at the risk of physical damage to the structure and reduce the scale of these impacts to a large degree, assuming they are enforced effectively and qualified expertise is relied upon. There are no mitigation measures which reduce the impacts that come from the removal of original fabric and the reconfiguration of the nature of the entrance.

While the Southern Entrance is one element of the overall building, it is highly sensitive as the first location which visitors interact with and which shapes their experience of the heritage values of the AWM. This is emphasised in the 2011 Heritage Management Plan for the site, which has as policy 1.1.3 to “conserve and manage the symbolic arrival into the main building through the Commemorative Area” (p 75). Therefore the scale, permanency and intensity of these changes will diminish, alter and obscure to a high degree the ability of the site to demonstrate these National/ Commonwealth Heritage values.

The Queens Tree, which was originally planted by Queen Elizabeth on the opening of Anzac Parade, is not specifically protected under the National or Commonwealth Heritage Listings for the site but is of heritage significance, and therefore is part of the protected heritage environment on Commonwealth land. The fact that the tree has been considered important enough to regularly replace reflects this. The fact that a tree exists in this location will be impacted by the new Southern Entrance. Mitigation measures (eg: the ceremonial planting of a new tree in a special location) have not been addressed.

Impact of Parade Ground Works

The proposed redevelopment works also includes re-profiling and reconfiguring the existing Parade Ground. This work will reportedly provide enhanced site security, increased capacity, better accessibility to seated areas and provide better viewing angles. The reconfigured Parade Ground would provide greater functionality to Defence personnel in regards to drills and marching.

The associated works and details of the Parade Ground includes:

- Expansion of parade ground and landscaped to provide additional capacity during ceremonial events.
- Removal of non-remnant trees bordering the existing forecourt.

The proposed mitigation measures for the Parade Ground includes:

- Retention of the Stone of Remembrance.

The re-profiling of the Parade Ground will have direct impacts on the National and Commonwealth Heritage values of the AWM.

The designed ceremonial landscape of the AWM is recognised as of heritage significance under the National Heritage criteria (a), (b), (e), (g) and (h) and Commonwealth Heritage criteria (a), (f), (g) and (h). This ceremonial landscape is an important element of the AWM expressing its values as a place designed specifically for special commemoration, and the Parade Ground is a key part of this landscape. By altering the layout of the Parade Ground and other landscaping changes, there will be direct permanent impacts to the heritage fabric of the site, as well as on the ability of the site to express this sense of the place as a designed commemoration space. Criterion (f) of the Commonwealth Heritage values recognises the importance of the “relative visual isolation” of the AWM, and a cluttered Parade Ground could impact this.

The new layout of the Parade Ground will replicate the functions of the existing Parade Ground and be designed in a way which is consistent with the overall ceremonial landscape it sits within, being a space that maintains the open landscape in front of the main memorial and creates room for memorial activities while not distracting from the main AWM building. In addition, the shape of the Parade Ground has been altered previously in 1959 to accommodate more viewing spaces and later in 2006 to include other facilities (p 127, HIA). As such, the intensity and scale of these impacts on the AWM’s ability to demonstrate this aspect of its National and Commonwealth Heritage values is reduced. The proposed Parade Ground alterations will obscure the existing heritage values of the AWM, but only to a low degree.

The proposed Parade Ground reconfiguration may also impact on the heritage values of the Parliamentary Vista, which is recognised as of National Heritage significance under criterion (a), (b) and (e) of the National Heritage Listing, and also recognised separately in the Parliament House Vista Commonwealth Heritage Listing. Views to the War Memorial along the Parliament House – Mt Ainslie land axis terminate at the AWM, and are “outstanding” (NHL criteria (e)) and have aesthetic significance as “designed axes set within natural features of forested hills, patterns and textures of architectural massing accentuated by planned open spaces” (CHL criteria (e)). The Parade Ground is in a central location in this Vista, directly in front of the AWM, and therefore any changes are highly visible. While the new design will look visually different, it will continue to reflect and support the landscape design of the AWM and the Parliamentary Vista as a whole, maintaining its symmetrical shape and a low profile that does not distract

from the main views. Mitigation measures to reduce impacts are present through these design choices. Assuming these high design standards are maintained, the proposed changes to the Parade Ground will have a low impact on the heritage values of the Parliamentary Vista.

Impact of Anzac Hall Demolition

The action proposes the complete demolition and replacement of Anzac Hall. Anzac Hall was completed in 2001, prior to the National and Commonwealth Heritage Listing of the site. The demolition of Anzac Hall will have a direct, permanent impact on the National and Commonwealth Heritage values of the AWM.

Anzac Hall as an Exhibition Space

Anzac Hall is an exhibition space that is significant as part of the site as a whole, and is particularly recognised as having aesthetic National Heritage values under criterion (e), which states that “the place has evoked strong emotional and artistic responses from Australian and overseas visitors” and that “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”.

Anzac Hall contributes to demonstrating the heritage values of the site by functioning as part of the aesthetically designed place which creates emotional responses in visitors. This comes from the physical design of the building, with its significant bulwark shape designed to appear as a sunken battleship, as well as the collections housed in the exhibition spaces, which visitors engage with and respond to. Demolishing Anzac Hall will be a direct impact which notably alters the ability of the site to express these aesthetic heritage values, as visitors will no longer be able to experience the building as part of the AWM complex or the collections as displayed in its exhibition spaces.

These impacts will be mitigated by the construction of a replacement hall which serves a similar function as the existing Anzac Hall. This will allow demonstration of the importance of collections, and the HIA states that the new build should be constructed with high quality materials and design (p 136). Even so, variations in the design of the new building will cause it to have different aesthetic significance to the original Anzac Hall and create a different response in visitors. The degree of mitigation of impacts from these actions can be predicted to a certain degree, through an understanding of the importance of appropriate architectural design in creating emotional responses in visitors. But due to the nature of people's response to aesthetic significance, the scale of the impacts and the efficacy of mitigation measures cannot be fully predicted. As such, there is a risk that the impacts on the aesthetic values of the AWM from the demolition of Anzac Hall will be at least moderate, and may be high.

Anzac Hall as an Architectural Achievement

In addition to the heritage significance of Anzac Hall as contributing to the aesthetic heritage significance of the AWM overall, it has heritage significance as an example of technical achievement as a building of architectural excellence. The technical achievement is reflected in the fact that Anzac Hall received the Royal Australian Institute of Architects Sir Zelman Cowen Award for public buildings for its design excellence in 2005. This technical achievement is not recognised at a national level as part of the National Heritage Listing. However, it is part of the heritage values of the place, which are protected in their entirety, whether listed or not, as part of the environment on Commonwealth land. The demolition of Anzac Hall will destroy the ability of the site to demonstrate this technical excellence, as the Hall and its technically outstanding features will no longer exist.

These impacts will be mitigated to a minor degree by recording of the existing Hall, allowing the technical achievement of its architectural design to still be accessed through archival records, as stated at p 137 of the HIA. However, overall the proposed demolition will have a permanent, high intensity impact which destroys the ability of the site to demonstrate these heritage values.

Impact of New Anzac Hall and Glazed Courtyard Construction

The proposed action includes the construction of a new Anzac Hall building as well as a glazed courtyard atrium between the rear of the existing Main Building and the new Anzac Hall.

New Anzac Hall

The new proposed Anzac Hall will be an alteration to the existing designed landscape and setting of the AWM, created to support the commemorative nature and functions of the site. The significance of this designed landscape is recognised under multiple heritage values, including (a), (b), (e), (g) and (h) of the National Heritage values, and (a), (f) and (g) and (h) of the Commonwealth Heritage values. The inclusion of a new building within this landscape will alter the way the AWM illustrates its commemorative nature through its spaces. Rather than being expressed through the existing buildings, the new Anzac Hall will intervene in the landscape and direct visitors to experience the site in a different way, for example existing as a physical divider between the AWM and the “backdrop of the forested slopes of Mt Ainslie” and drawing attention away from the main building to a degree. These are permanent impacts with a moderate scale and intensity, within the scope of the site as a whole.

The impacts of this new Anzac Hall are predictable, and will be reduced to a degree by the fact that it is replacing an existing building which plays a similar role in the landscape, and by the architectural design of the new building. The existing Anzac Hall also draws focus from the main AWM building and creates a divide with the current building, but was in place at the time the heritage values of the AWM were recognised through National and Commonwealth Heritage Listing. As such the way the AWM currently demonstrates the heritage values of its commemorative spaces will be generally maintained at the same level due to the similar function and location of the new Anzac Hall.

The design of the new Anzac Hall is intended to reduce its visibility from Anzac Parade, Mt Ainslie and to lower the profile of the building in general, through its sloping roof and excavated exhibition spaces. This reflects the decisions made in the construction of the original Anzac Hall, which was “excavated in the hillside, so that it would have the minimum impact on views from Anzac Parade” (History, NH Listing). In addition the high standard of architectural design of the building responds to the existing landscape and functions of the AWM, for example being separate from the main building itself to reduce its imposition on that building’s primacy in the landscape. However, the new

Anzac Hall will be larger than the existing Anzac Hall, meaning its effect on the ceremonial landscape will be increased. In addition the new Hall will pair with the glazed atrium, increasing its impact, which is discussed below in **Overall Impacts**.

Because of the larger size of the new Anzac Hall, its construction will obscure the heritage values of the AWM, in particular its carefully designed commemorative landscape, to a moderate degree.

New Glazed Courtyard

A glazed link is proposed which will create an enclosed atrium space between the rear of the Main Building and the new Anzac Hall. This glazed link will have a gentle domed shape which sits lightly on the rear parapets of the Main Building. This will create additional exhibition space in the atrium, which will also include a café area and space for functions and events.

The proposed glazed atrium will have a number of direct impacts on different elements of the National and Commonwealth Heritage values of the AWM.

Impacts on Original Heritage Fabric

The proposed glazed link requires physical intervention into the original fabric of the Main Building of the AWM. While the link will sit on top of the parapet, it will still need to be connected to the main building. It will also cause weathering of the stone of the Main Building of the AWM at different rates, creating a differential in the condition of the original fabric of the Main Building from the inside to the outside. Within the atrium, works will be undertaken to install a new courtyard slab and flooring, which are intended to be reversible and protect the main building (Fig 31, HIA). These physical effects on the original fabric of the AWM will impact on its ability to express its heritage values as a building constructed in the 1920s to a high construction and design standard to serve as Australia's memorial and museum. These values are particularly recognised through the National Heritage criteria (a), (b), (e), (g) and (h), which all recognise the importance of the fabric of the Main Building, and also in particular criterion (d) of the Commonwealth Heritage values, which recognises the fine styling and design of the AWM as an example of Art Deco architecture. These impacts will be permanent. In regards to the scale of the AWM as a whole, the intervention to attach the glazed link will be of a smaller scale and intensity impact, as it does not require major interventions into the fabric. The variation in weathering in stone will be a somewhat larger scale impact, because of the amount of stone enclosed by the atrium, and will happen slowly but over a relatively long period of time. However, the design and construction history of the building will still be able to be read through its fabric even if the stone is weathered, although severe weathering caused by a lack of management would be a higher risk.

These impacts to the physical fabric are predictable. However, the HIA does not include many mitigation measures for these impacts. The requirement for high quality design and matching sandstone for any new elements is included in the HIA (p 136). However, this does not reduce the amount of intervention into the existing fabric. The HIA also states that changes in weathering should be monitored but does not include specific ways of managing this (pp 136, 127). In light of the moderate scale and intensity of these impacts, overall the ability to interpret the heritage values of the site through its fabric will be obscured to a moderate degree.

Impacts on War Memorial in its setting

In addition to the effects on the physical fabric of the Main Building, the glass atrium will impact on the heritage values of the AWM Main Building as a piece of commemorative architecture experienced by Australians in its designed setting. The Referral Document recognises the importance of reading the Main Building “in the round” (p 7), ie: for visitors to be able to have a 360 degree experience of the AWM Main Building so they can understand the complete story told by the building and its relationship with the surrounding landscape. The care and precision that was dedicated to the construction of the AWM Main Building and its relationship with its designed landscape reflects the importance of the AWM in the national consciousness. This is recognised in multiple values, including Criterion (d) of the Commonwealth Heritage values, which states that “the building’s design also successfully fulfils its special functions and reinforces the role of the place as a Shrine” and Criterion (a) and (e) of its National Heritage values, which state that the AWM “embodied the vision of Charles Bean – Official First World War correspondent – that the war would be instrumental in creating a sense of nationhood and a distinctly Australian identity” and that “The AWM in its setting is of outstanding importance for its aesthetic characteristics”. While the Referral Document refers to the rear of the building as “dead space” (p 7) this is a misinterpretation of the heritage values of the place. Though not the most sensitive area of the AWM, this space nevertheless serves an architectural and design function. This is reflected in the 2011 HMP, with Policy 1.12.5 to “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” (p 67).

By enclosing the rear of the building within the glazed atrium, this will obscure the ability of Australians to interpret these heritage values, diminishing the understanding of the main AWM building as part of a broader cultural landscape because they can no longer experience the building in the round as originally intended. This impact will be permanent and direct. It will still be possible to interpret the AWM’s original relationship with its setting to a degree, as most of the front sides of the Main Building will remain unobscured. However, the glass atrium is still a large, highly visible imposition into this relationship between the building and its setting. As such, the scale of the impact on these heritage values will be remain relatively high. The intensity of this impact can be well understood by comparing the scale and complexity of the glass atrium as a connecting feature to the relatively simple glazed bridge which currently connects Anzac Hall to the Main Building, keeping a clear distinction between them.

These impacts are predictable and are being managed through mitigation measures to an extent. The fact that the atrium is glass makes it easier to still see the original empty space at the rear of the AWM and understand how its original relationship with its setting would have functioned. The rounded shape also gives it a lighter presence in the space, a sense of floating above the building rather than intruding. However, the glass still needs to be supported with significant other materials, and its size means it will still be highly visible. This is clear in the images on pages 148 and 149 of the HIA. As such, the heritage values of the AWM will be obscured to a high degree by the addition of the glass atrium.

Impacts on Parliament House Vista

The glazed atrium may have an impact on the heritage values of the Parliamentary Vista. The atrium will sit slightly above the parapet of the building, which is inconsistent with Policy 1.11.2 in the 2011 HMP that “any new development within the AWM Campbell Precinct’s [...] height is less than the parapet of the AWM main building” (p 67). The rounded shape of the glazed atrium roof will give it a higher profile. It should not be visible from anywhere along the axis looking towards the AWM. Any visibility will be a high impact on the Parliamentary Vista, in particular under National Heritage criterion (e) which states that “Its prominent position is important due to its relative visual isolation on the Griffin land axis, amid the backdrop of the forested slopes of Mount Ainslie. The visual impact of the AWM when viewed from Parliament House and other

points along Griffin's land axis including Mount Ainslie; and the fabric of Anzac Parade including the memorials, plantings and lighting is far more distinctive and dramatic compared to the other principal war memorials in Australia." Images at pages 144 and 145 of the HIA suggest that it will not be visible but the images are not of sufficiently quality to confidently establish this.

The atrium may also be visible from views along Mt Ainslie looking towards Parliament House. The HIA states that "the proposed glazed courtyard will alter part of the Parliament House Vista when viewed from Mt Ainslie" (p 140). Images in the HIA at p 147 are not large and high resolution enough to give a satisfactory understanding of how visible the atrium will be. Care should be taken to ensure the atrium is low profile and hidden below the bulk of Anzac Hall or in some other way in views from Mt Ainslie. The rounded shape of the atrium also increases the likelihood that it could catch the light and cause unexpected glare which could be highly visible within the Vista – this risk needs to be addressed. Further information on this issue is needed for a fully informed understanding of impacts. Due to the sensitivity and important of the Parliament House Vista, impacts should be considered as potentially high in a precautionary way.

Overarching/Cumulative Impacts

In addition to the assessment of specific aspects of the proposed action above, it is necessary to consider the overall impacts of the proposal on the site as a whole. The elements of the action and their impacts discussed above come together to create an overall cumulative impact on the heritage values of the AWM. These impacts are in relation to two main issues.

Firstly, the new Southern Entrance, Anzac Hall demolition and reconstruction, and glazed atrium come together to create a large scale, permanent and high intensity impact on the original fabric of the AWM which is being altered or removed, fabric which plays an important role in demonstrating the history of the site as a building specially designed and constructed to a standard of excellence to serve its purposes as a shrine and memorial. They will also cause large scale, permanent and high intensity impacts on the on the nature of the AWM as a commemorative structure which has carefully designed relationships with its setting within a created landscape. The works at the Parade Ground contribute to this but to a lesser extent.

Mitigation measures that will reduce these impacts to some extent are proposed at Section 9.3 of the HIA, for example ensuring the new additions are prepared with excellent design standards and quality materials, protecting heritage fabric and handling it carefully, and undertaking archival recording and preparing heritage interpretation to tell the story of the site. However, this mitigation measures will not change the overall nature and scale of the proposed action, and so do not reduce its impacts by a significant amount. It is also unclear whether these mitigation measures are merely proposals or have been committed to.

By altering the fabric of the original building and adding new features and constructions both at the front and rear of the building, as well as internal alterations associated with the Southern Entrance, the proposed action will variably alter, obscure and diminish to a high degree the National and Commonwealth Heritage values of the AWM. Additionally, some heritage values will be degraded to an extreme degree, for example the technical achievement heritage values of Anzac Hall.

Secondly, the proposed action as a whole, in particular the Southern Entrance, Anzac Hall replacement and glazed atrium will have a large scale and permanent impact on the heritage values of the AWM as a space which is well-designed to serve multiple and complimentary memorial and commemorative functions. Criteria (b) of the Commonwealth Heritage values states that:

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.

This heritage value is also expressed in multiple other forms in the listed values, for example the statement in Criterion (a) of the National Heritage values that the importance of the AWM as an outstanding national museum and memorial is expressed through all of “the main building, the courtyard fabric, interior spaces, the Sculpture Garden and the collections”, ie: the different parts of the AWM all work together in concert to express its heritage values.

The importance of the balanced relationship between the building, the collections and the commemorative spaces to the nature of commemoration at the War Memorial is impacted by the addition of three large new spaces which are focused primarily on exhibition of collections, visitor services and functions and events. In this arrangement, the original AWM Main Building’s significance is reduced, as is the significance of the commemorative spaces. They are reduced both by the increased scale of exhibition spaces relative to the size of the site as a whole, which outweighs and pulls focus from the commemorative spaces, as well by as the physical impacts to the building and commemorative spaces occurring to facilitate the creation of exhibition spaces. While the exhibition spaces contribute to the commemoration of war, it is their combination with the building and commemorative spaces that makes the AWM significant in Australia – it serves not only as a museum, or a commemoration space, or a place of architectural excellence, but an equal and complimentary balance of all three.

The extent of the impacts on these heritage values can be managed to a degree through actions such as ensuring the uses of the new additional spaces are appropriate to the solemn and commemorative nature of the AWM, by designing the spaces in a way that minimises their imposition on the Main Building and other commemorative spaces, and by properly integrating the three aspects of the AWM across the new and old spaces. However, there is little information in the HIA which indicates if these or other mitigation measures will actually be undertaken. Such information would assist in a better understanding of impacts. Nevertheless, the addition of the three major elements remains of a large scale, and the action will diminish the ability of the AWM to express its nationally significant heritage values to a high degree.

Other issues

- The Referral Document does not have a clear and comprehensive description of the action. It describes outcomes rather than activities.
- The Heritage Impact Assessment (HIA) does not address the impacts on social heritage values, which are protected as a National Heritage Value under criterion G and the Commonwealth Heritage Value under criterion G. The AWM needs to address how changes to the building could affect the social importance of the AWM to the

Australian community as a focal point for national commemoration. While these values are intangible, they are essential to the AWM's national and Commonwealth heritage significance.

- The HIA does refer to consultation that was undertaken, and a consultation summary is included in the referral documentation, but none of this consultation was targeted towards assessing impacts on the social values of the AWM. However, that consultation could be the starting point for some social values impact analysis.
- The HIA briefly discusses alternative options to Anzac Hall, however, further explanations or options are not discussed such as extensions or excavations. Alternatives to the glazed atrium and the Southern Entrance are not discussed at all. As such, it is hard to determine the justifiability of the proposed actions and the acceptability of impacts.
- The HIA discusses a number of proposed Mitigation Measures at Section 9.3, and Mitigation Principles are include at Attachment F.
 - It is unclear whether these proposed measures have been committed to by the AWM, or are just optional, as the HIA states “the following mitigation measures are provided for consideration” (p 166). Clarity is needed on this to be able to fully determine the extent of impacts.
 - The proposed mitigation measures are in some cases insufficient and will need to be expanded or added to, to reduce impacts to an acceptable level.
 - For example the Mitigation Principles included at Attachment F are not particularly reflected in practice in the choices made in designing the action. Eg: some of the General Principles are highly focused on adaptive re-use, but there is negligible adaptive re-use in the action – rather, Anzac Hall is being demolished.
 - Similarly the Mitigation Principles discuss making changes reversible “unless there is not alternative way of retaining the place as a viable asset” – such a measure is limited in its usefulness by this wording which appears to prioritise asset management over proper coordination between use and heritage values. An approach like this is inconsistent with the National and Commonwealth Heritage Management Principles and heritage best practice approaches as articulated in the Burra Charter.
 - Mitigation Measure included in the HIA itself are suitable, such as the requirement to use sympathetic, high quality materials, installing heritage interpretation, doing archival recording etc, but as discussed above it is unclear how much these will be implemented.
- The HIA incorrectly states that the Heritage Management Plan (HMP) 2019 is a final document and that is likely to be accredited in late 2019. In September/October 2019 there was some anticipation this may occur, and the inclusion of references to the 2019 draft HMP was in response to advice from the Department due to the short and overlapping timeframes of the project. But the 2019 HMP was not completed and is anticipated to be presented to the Australian Heritage Council in early 2020.
 - The 2019 draft HMP has a number of unresolved issues and should not be relied on for heritage impact assessment purposes. The 2011 HMP is the current HMP for site management.

- Collections, exhibitions and accessibility to the Australian community are all importance functions of the AWM. To a degree, the proposed action will have some positive impacts on these aspects of the AWM's values. However, as discussed above these need to be considered in the context of the site as a whole, and balanced with the associated negative heritage impacts.
- A number of future activities are also proposed for the AWM site after completion of this referred action. These other activities may have impacts at a later date.

Further Information Needed

Further information on a number of aspects are required to provide complete understanding of impacts of the proposed action and guide decisions on appropriate management of these impacts.

- Clarity on the exact nature of the proposed works with a clear list of the elements of the action, eg: will they build the connector tunnel from the carpark to the southern entrance? Are lifts being installed from the southern entrance to the upper levels as part of this referral? Where exactly are skylights being installed in the original fabric?
- Information on whether the proposed Mitigation Measures in the HIA are to be implemented and to what extent.
- Information on how the AWM proposes to maintain the significance of the accessibility of the main entrance while also delivering the Southern Entrance, noting particularly the heritage values of the AWM as existing to be a commemorative space accessible to all Australians.
- Adjusting the references to the 2019 HMP in the HIA. These should be removed or contextualised with an appendix or cover sheet.
- Information on the impacts on social values of the AWM – the AWM should gather information on impacts to social heritage values of the place which considers all elements of the action, using a method which is accessible to all members of the community for which the site has social heritage significance. Further discussion can determine the scope of this research; a separate survey may be needed or this information gathering could be integrated into existing consultation processes.
- More information on the proposed functions being held at the AWM and function spaces being constructed – what will be the protocols for these spaces? What measures will be in place to ensure functions are managed in a way appropriate to the solemnity and seriousness of the site? Also similar information about other visitor-focused/ancillary functions being built.
- More information on alternative options that were considered and comparative assessment of their impacts. Alternatives were considered for Anzac Hall but not discussed for other features of the referral.
- Higher quality images of key viewing locations.

Relevant Management Plans

Name, date and SPIRE Link	Plan covers:	Advise whether the Action proposed may be consistent with this plan
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Not applicable.

While there is a 2011 Heritage Management Plan for the Australian War Memorial, this has not been made into a Legislative Instrument and it therefore not a management plan to which the Minister must not act inconsistently with. As such, it is not relevant for discussion here, but has been taken into account as useful information which helps in the determination of impacts in the discussion above.

Summary

Overall, the proposed redevelopment project as a whole will have wide-reaching and permanent impacts which will obscure, notably alter and diminish the AWM's National and Commonwealth Heritage values. The proposed redevelopment also has the potential to adversely impact upon the Parliament House Vista Commonwealth Heritage values.

The key elements associated with the proposed action which are likely to have a high degree of adverse impact are:

- The overall project - with the cumulative impact of all of its physical intervention and removal of original fabric for the creation of the Southern Entrance, new Anzac Hall and glazed atrium; addition of new structures and changes to the nature of the AWM within its landscape setting; and the effect on the balance of the relationship between the building, commemorative areas, and collections. This impacts all National and Commonwealth Heritage Values.
- Southern Entrance works and the closure of the original entrance, impacting on the demonstration of the commemorative design and memorial experiences created by the nature and accessibility of the existing entrance. This particularly impacts on criteria (a), (e) and (g) of National Heritage values, and (d) of Commonwealth heritage values.
- Demolition of the existing Anzac Hall and associated impacts on its architectural heritage values. This particularly impacts on Anzac Hall as heritage on Commonwealth land.
- Addition of the glazed atrium and its impacts on the ability to read the design of the building and its position within the landscape. This impacts on all values, particularly criteria (a) and (e) of National Heritage values, and (d) of Commonwealth Heritage values.
- Risk of impacts on the Parliamentary Vista through the glazed atrium's position above the parapet. This could impact in particular on AWM National Heritage criteria (a), (e), Commonwealth Heritage criteria (a), (e) and (f), and Parliament House Vista Commonwealth Heritage values (a), (e), (f) and (h).

There are a number of aspects of the proposed action that need addressing to fully understand the nature and the impacts of the redevelopment. The key issues that require further addressing are:

- Further information to be provided as requested.

- More information on mitigation measures.
- Further discussion of alternatives, particularly to the Southern Entrance and glazed atrium.
- Further investigation of the social impacts from the proposed redevelopment.

<p>Primary Heritage Contact Officer for ongoing contact through Assessment/Approval stages</p> <p>s22(1)</p>	<p>Historic Heritage Section</p>	<p>9/12/2019</p>	<p>Cleared by</p> <p>s22(1)</p>	<p>Director, Historic Heritage Section</p>	<p>9/12/2019</p>	<p>s22(1)</p>
<p>Consistency of Proposal with National Heritage Management Principles</p>	<p>When making a decision about approval of actions relating to National Heritage under section 15B, 15C or 137A of the EPBC Act, the Minister must not act inconsistently with:</p> <ul style="list-style-type: none"> a) the National Heritage management principles; b) an agreement to which the Commonwealth is party in relation to a National Heritage place; or c) a plan that has been prepared for the management of a National Heritage place under section 324S or as described in section 324X. <p>In addition, under s 341V, the Commonwealth or a Commonwealth agency must not:</p> <ul style="list-style-type: none"> (a) contravene a plan made under section 341S; or (b) authorise another person to do, or omit to do, anything that, if it were done or omitted to be done by the Commonwealth or the Commonwealth agency (as appropriate), would contravene such a plan. <p>If there is no plan in force under section 341S for a particular Commonwealth Heritage place, the Commonwealth and each Commonwealth agency must take all reasonable steps to ensure that its acts (if any) relating to the place are not inconsistent with the Commonwealth Heritage management principles.</p> <p>The National and Commonwealth Heritage Principles are attached at Attachment A. For simplicity they are discussed together below.</p> <p>As currently proposed, the action potentially is inconsistent with Principles 4 and 5 of the National and Commonwealth Heritage Principles.</p>					

The high degree of impact from the proposed action indicates that the management of the heritage place currently does not ensure its use and presentation is consistent with the conservation of its National and Commonwealth Heritage values.

Additionally, the impacts on social heritage value of the place as recognised under criterion (g) of the National and Commonwealth Heritage Management Principles has not been fully considered, indicating that the management of the site may not have made timely and appropriate provision for community involvement.

This may be addressed during the assessment process before a decision is made under section 15B, 15C or 137A. The consistency of the action with the National and Commonwealth Heritage Management Principles should be reviewed at this time.

Sources

- Australian Heritage Database - Place Details
 - Australian War Memorial and the Memorial Parade – National Heritage Listing http://www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=place_detail;search=place_name%3Daustralian%2520war%2520memorial%3Bkeyword_PD%3Don%3Bkeyword_SS%3Don%3Bkeyword_PH%3Don%3Blatitude_1dir%3DS%3Blongitude_1dir%3DE%3Blongitude_2dir%3DE%3Blatitude_2dir%3DS%3Bin_region%3Dpart;place_id=105889
 - Australian War Memorial – Commonwealth Heritage Listing http://www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=place_detail;search=place_name%3Daustralian%2520war%2520memorial%3Bkeyword_PD%3Don%3Bkeyword_SS%3Don%3Bkeyword_PH%3Don%3Blatitude_1dir%3DS%3Blongitude_1dir%3DE%3Blongitude_2dir%3DE%3Blatitude_2dir%3DS%3Bin_region%3Dpart;place_id=105469
 - Parliament House Vista – Commonwealth Heritage Listing http://www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=place_detail;search=place_name%3Dparliament%2520house%3Bkeyword_PD%3Don%3Bkeyword_SS%3Don%3Bkeyword_PH%3Don%3Blatitude_1dir%3DS%3Blongitude_1dir%3DE%3Blongitude_2dir%3DE%3Blatitude_2dir%3DS%3Bin_region%3Dpart;place_id=105466
- Department of the Environment and Energy. 2019 *Referrals list – Basic Portal* <http://epbcnotices.environment.gov.au/referralslist/>
- Godden Mackay Logan Heritage Consultants. 2011 *Australian War Memorial Heritage Management Plan*. Available from: <https://www.awm.gov.au/sites/default/files/AWM%20Heritage%20Management%20Plan%20Jan%202011.pdf>
- Referral documentation, including:
 - GHD. 2019 *Australian War Memorial Redevelopment Heritage Impact Assessment*

Volume 1: <http://170715.spire.environment.gov.au/125/2019-8574%20Australian%20War%20Memorial%20Redevelopment,%20Campbell,%20ACT/2019-8574%20Attachment%20E%20AWM%20Redevelopment%20HIA%20Vol%201%20.pdf>

Volume 2: <http://170715.spire.environment.gov.au/125/2019-8574%20Australian%20War%20Memorial%20Redevelopment,%20Campbell,%20ACT/2019-8574%20Attachment%20E%20AWM%20Redevelopment%20HIA%20FINAL%20Vol%202.pdf>

From: s22(1)
To: s22(1)
Cc: s22(1)
Subject: RE: Review of draft AWM Conditions [SEC=OFFICIAL]
Date: Wednesday, 14 October 2020 8:20:24 AM
Attachments: [image001.jpg](#)

Hi s22(1),

Thank you for sending through the draft conditions for review. As discussed yesterday, we have a couple of suggestions for changes:

8.d. – should read ‘maximise transparency’ rather than ‘maximise opacity’.

10.c – ‘to the front of the lift’ is unclear. Suggest ‘to the south and north of the lift’. They are also only proposing a small hedge, which doesn’t cover the glass lift. It was our understanding from our discussions with AWM that they committed to ‘screening the glass’ – ie: taller plants that will cover more of the glass. Suggest adding further detail that specifies the height of the planting.

Thanks s22(1). As always, if you need anything let me know.

Thanks,
s22(1)

Dr s22(1)

Historic Heritage Section, Heritage Branch
Department of Agriculture, Water and the Environment
a: GPO Bux 858 CANBERRA ACT 2601
t: s22(1)
e: s22(1)



From: s22(1)
Sent: Monday, 12 October 2020 7:27 PM
To: s22(1)
Cc: s22(1)
Subject: Review of draft AWM Conditions [SEC=OFFICIAL]

Hi s22(1)

Please see below the links to the draft conditions for the AWM development and relevant attachments to the conditions for Heritage Section review. As the statutory approval clock has commenced a response as soon as possible would be greatly appreciated.

Draft Condition set: <http://170715.spire.environment.gov.au/125/2019-8574%20Australian%20War%20Memorial%20Redevelopment,%20Campbell,%20ACT/Proposed%20Decision-Notice.docm>

Appendix A: <http://170715.spire.environment.gov.au/125/2019-8574%20Australian%20War%20Memorial%20Redevelopment,%20Campbell,%20ACT/Proposed%20Decision-Final%20PD-Att%20G-New%20Southern%20Entrance%20Design%20Response.pdf>

Appendix B: <http://170715.spire.environment.gov.au/125/2019-8574%20Australian%20War%20Memorial%20Redevelopment,%20Campbell,%20ACT/Proposed%20Decision->

[Final%20PD-Att%20H-Anzac%20Hall%20and%20Glazed%20Link%20Design%20Response%20Sep-20.pdf](#)

Thanks again for your help,

s22(1)

Assessment Officer

Environment Assessments NSW, ACT | Environment Approvals Division

Department of Agriculture, Water and the Environment

E: **s22(1)**

The Department acknowledges the traditional owners of country throughout Australia and their continuing connection to land, sea and community. We pay our respects to them and their cultures and to their elders both past and present.