

**s. 22(1)(a)(ii)**

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**From:** s. 22(1)(a)(ii)  
**Sent:** Monday, 9 December 2019 5:33 PM  
**To:** s. 22(1)(a)(ii)  
**Cc:** Heritage EPBC Mailbox; s. 22(1)(a)(ii)  
**Subject:** RE: Heritage Advice – 2019-8574 Australian War Memorial Redevelopment-Referral [SEC=OFFICIAL]  
**Attachments:** Line Area advice template - Heritage Branch.docx  
**Categories:** Red Category

Hi s. 22(1)(a)(ii)

Please find attached our advice on the War Memorial referral, cleared by my Director s. 22(1)(a)(ii).

Our comments are overall consistent with our initial thoughts, but address more clearly and in more detail the nature and extent of impacts, mitigation measures, which criteria are impacted, etc. We have added a couple of extra points to the requests for further information as well.

Please don't hesitate to let us know if you have any questions or would like to discuss further.

You may be interested to know that the Australian Heritage Council is meeting today and tomorrow and we were meeting with our Historic Heritage expert member of the Council. She has been looking over the referral documentation and also found it very unclear and unsatisfactory. The Council will be discussing whether they want to put in a submission.

Cheers

s. 22(1)(a)(ii)

Historic Heritage Section  
Department of the Environment and Energy

a: GPO Box 787 CANBERRA ACT 2600

s. 22(1)(a)(ii)



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**From:** s. 22(1)(a)(ii)  
**Sent:** Wednesday, 20 November 2019 1:17 PM  
**To:** Heritage EPBC Mailbox  
**Cc:** s. 22(1)(a)(ii)  
**Subject:** Heritage Advice – 2019-8574 Australian War Memorial Redevelopment-Referral [SEC=OFFICIAL]

Dear s. 22(1)(a)(ii)

I am writing to request comments on the following EPBC project:

EPBC Number: 2019-8574

Referral Title: Australian War Memorial Redevelopment

Project Stage: Referral

Project Documentation: <http://170715.spire.environment.gov.au/125/Forms/Agency%20Assessment%20File/docsethomepage.aspx?DocID=77b9-4354-b587-a1fbade47e43&RootFolder=%2F125%2F2019%2D8574%20Australian%20War%20Memorial>

Potential Issues: Review of Referral documentation and Heritage Impact Assessment, advice on adequacy of impact assessment

Timeframe for providing advice: Please email your advice to the Primary EAB contact Officer by **29/11/19**.

Previous Advice/referrals: No previous referrals have been submitted relating to this action, however a number of pre-referral meetings have been held for the site. Pre-referral SPIRE site: <http://170715.spire.environment.gov.au/123/Forms/Agency%20Assessment%20File/docsethomepage.aspx?DocID=0399-491b-bcfc-f1163ee2a170&RootFolder=%2F123%2FPre%2Dreferral%20Australian%20War%20Memorial>

**Primary EAB Contact Officer details**

Name: s. 22(1)(a)(ii)

Email: s. 22(1)(a)(ii)

**Secondary EAB Contact Officer details**

Name: s. 22(1)(a)(ii)

Email: s. 22(1)(a)(ii)

**Relevant ESD Director**

Name: s. 22(1)(a)(ii)

Email: s. 22(1)(a)(ii)

Timeframe for providing advice: 29/11/19

Kind regards,

s. 22(1)(a)(ii)

Southern NSW and ACT Assessments



**s. 22(1)(a)(ii)**

---

**From:** s. 22(1)(a)(ii)  
**Sent:** Friday, 25 September 2020 2:10 PM  
**To:** s. 22(1)(a)(ii)  
**Cc:** s. 22(1)(a)(ii)  
**Subject:** RE: Draft additional HHS line area advice - AWM redevelopment [SEC=OFFICIAL]

Thanks s. 22(1)(a)(ii)

We'll review and get back with any further questions.

Cheers

s. 22(1)

---

**From:** s. 22(1)(a)(ii)  
**Sent:** Friday, 25 September 2020 1:55 PM  
**To:** s. 22(1)(a)(ii)  
**Cc:** s. 22(1)(a)(ii)  
**Subject:** RE: Draft additional HHS line area advice - AWM redevelopment [SEC=OFFICIAL]

Hi s. 22(1)(a)(ii)

Attached has additional comments to address your questions (left as TCs so they are easy to find).

Cheers,

s. 22(1)(a)(ii)

**s. 22(1)(a)(ii)**

Historic Heritage Section, Heritage Branch  
Department of Agriculture, Water and the Environment

**a:** GPO Box 858 CANBERRA ACT 2601

**s. 22(1)(a)(ii)**



---

**From:** s. 22(1)(a)(ii)  
**Sent:** Friday, 25 September 2020 11:51 AM  
**To:** s. 22(1)(a)(ii)  
**Cc:** s. 22(1)(a)(ii)  
**Subject:** RE: Draft additional HHS line area advice - AWM redevelopment [SEC=OFFICIAL]

Hello

Thanks for the advice, its well written. I have a couple of questions. It is getting down to the nitty-gritty but these are the sorts of questions I suspect would be asked of me up the line.

Are you able to provide advice as to whether or not these changes are of such a material nature that the threshold test for the listing of any of the criteria would be lost?

For example, would the demolition of ANZAC Hall be such a material change that criterion (e) in the NHL would be lost?

The glass lift – the PD states (p 65) is well outside the Parliament House vista – your advice is that it's within the vista – some context/justification for it being in the PH vista would be great.

The glass lift – the Response to Submission states on page 100 commitment 9: the Memorial will ensure the lift car will be designed, specified and operated to automatically return to the below ground level position when not in use to minimise visual intrusion on the southern viewing axis. This is not touched on in your advice – if this could be reflected in your advice, that would be great.

Car parking in Figures 6.3; 6.4 and 6.5, we think the AWM might be recycling previous photos to demonstrate flora, fauna and Indigenous heritage matters – we have asked them to clarify and amend. We will share the final PD with you in case you need to amend your advice.

Happy to chat

Cheers

s. 22(1)

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**From:** s. 22(1)(a)(ii)

**Sent:** Friday, 25 September 2020 10:19 AM

**To:** s. 22(1)(a)(ii)

**Cc:** s. 22(1)(a)(ii)

**Subject:** RE: Draft additional HHS line area advice - AWM redevelopment [SEC=OFFICIAL]

Thanks for the quick turn around s. 22(1)(a)(ii) and s. 22(1)(a)(ii)

Cheers

s. 22(1)(a)(ii)

---

**From:** s. 22(1)(a)(ii)

**Sent:** Friday, 25 September 2020 9:18 AM

**To:** s. 22(1)(a)(ii)

**Cc:** s. 22(1)(a)(ii)

**Subject:** Draft additional HHS line area advice - AWM redevelopment [SEC=OFFICIAL]

Hi Team,

Draft additional HHS line area advice attached for the AWM redevelopment.

s. 22(1)(a)(ii) has cleared the advice but we are treating it as a draft at this point – do let us know if it is fit for purpose.

Happy to discuss.

Ta,

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

Historic Heritage Section, Heritage Branch  
Department of Agriculture, Water and the Environment

a: GPO Box 858 CANBERRA ACT 2601

s. 22(1)(a)(ii)



The department acknowledges the Traditional Custodians of Australia and their continuing connection to land, sea environment, water and community. We pay our respect to the Traditional Custodians, their culture, and elders both past and present.

**s. 22(1)(a)(ii)**

---

**From:** s. 22(1)(a)(ii)  
**Sent:** Friday, 5 February 2021 2:40 PM  
**To:** s. 22(1)(a)(ii)  
**Subject:** FW: Draft additional HHS line area advice - AWM redevelopment [SEC=OFFICIAL]  
**Attachments:** Line area advice AWM redevelopment.docx

Hi s. 22(1)(a)(ii)

Thread below covers additional FOI requests 2 and 3 (dated 3/2/21).

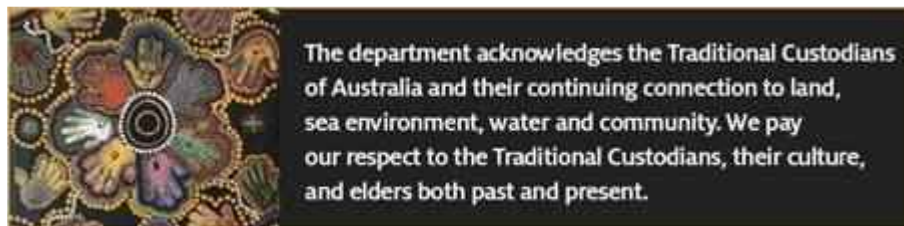
Document **attached** is from the 25/9/20 1:55pm email showing changes made to advice.

Cheers,

s. 22(1)(a)(ii)

**s. 22(1)(a)(ii)**

Historic Heritage Section, Heritage Branch  
Department of Agriculture, Water and the Environment  
a: GPO Box 858 CANBERRA ACT 2601

**s. 22(1)(a)(ii)**

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**From:** s. 22(1)(a)(ii)  
**Sent:** Friday, 25 September 2020 3:55 PM  
**To:** s. 22(1)(a)(ii)  
**Subject:** RE: Draft additional HHS line area advice - AWM redevelopment [SEC=OFFICIAL]

Hello,

Hmmm, this is a tricky one.

Anzac Hall is explicitly identified in the NHL values statement.

The CHL listing does not specifically list the building under the values (but does mention it in the description section).

I think s. 22(1)(a)(ii) earlier advice is right in that under a 'whole of environment' assessment on Cwth land, Anzac Hall needs to be considered as a heritage value even though it is not specifically listed under the CHL values.

The problem comes from when the CHL was established many of the listings were copied whole sale from the Register of the National Estate, which is much older and therefore probably predated Anzac Hall's construction. The NHL on the other hand would have required a whole new assessment being written which would have taken into account Anzac Hall.

Hopefully that makes sense?

s. 22(1)(a)(i)

s. 22(1)(a)(ii)

Historic Heritage Section, Heritage Branch  
Department of Agriculture, Water and the Environment  
a: GPO Box 858 CANBERRA ACT 2601

s. 22(1)(a)(ii)



**From:** s. 22(1)(a)(ii)

**Sent:** Friday, 25 September 2020 3:46 PM

**To:** s. 22(1)(a)(ii)

**Subject:** RE: Draft additional HHS line area advice - AWM redevelopment [SEC=OFFICIAL]

Hi s. 22(1)(a)(i)

Does the demolition of ANZAC Hall also impact CHL values – see original Heritage advice in relation to Technical Achievement, which states that it is in relation to environment on Commonwealth Land (checking this is not meant to be CHL as there is a technical achievement aspect of the CHL, but this seems to be more in relation to the Main Building?):

*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.*

Summary of referral heritage advice:

- High degree of adverse impact - 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.

Thanks!

s. 22(1)(a)(ii)

**From:** s. 22(1)(a)(ii)

**Sent:** Friday, 25 September 2020 1:55 PM

**To:** s. 22(1)(a)(ii)

**Cc:** s. 22(1)(a)(ii)

**Subject:** RE: Draft additional HHS line area advice - AWM redevelopment [SEC=OFFICIAL]

Hi s. 22(1)(a)(ii)



Attached has additional comments to address your questions (left as TCs so they are easy to find).

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Historic Heritage Section, Heritage Branch  
Department of Agriculture, Water and the Environment  
a: GPO Box 858 CANBERRA ACT 2601

s. 22(1)(a)(ii)



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**Subject:** RE: Draft additional HHS line area advice - AWM redevelopment [SEC=OFFICIAL]

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Happy to chat

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s. 22(1)

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Cheers

s. 22(1)(a)(ii)

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**From:** s. 22(1)(a)(ii)**Sent:** Friday, 25 September 2020 9:18 AM**To:** s. 22(1)(a)(ii)**Cc:** s. 22(1)(a)(ii)**Subject:** Draft additional HHS line area advice - AWM redevelopment [SEC=OFFICIAL]

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<sup>s. 22(1)(a)(ii)</sup> has cleared the advice but we are treating it as a draft at this point – do let us know if it is fit for purpose. Happy to discuss.

Ta,

s. 22(1)(a)(ii)

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Historic Heritage Section, Heritage Branch  
Department of Agriculture, Water and the Environment

a: GPO Box 858 CANBERRA ACT 2601

s. 22(1)(a)(ii)



The department acknowledges the Traditional Custodians of Australia and their continuing connection to land, sea environment, water and community. We pay our respect to the Traditional Custodians, their culture, and elders both past and present.

## Document 3a

<b>Additional Heritage line area advice on Australian War Memorial redevelopment – 21/09/20</b>	
To be read in conjunction with Heritage line area advice 9/12/19	
<b>Impact of Demolition of the Original Anzac Hall</b>	<p><b>ADVICE UNCHANGED</b></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. <a href="#">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.</a></p>
<b>Impact of New Anzac Hall</b>	<p><b>UPDATED ADVICE</b></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>
<b>Impact of the Glazed Link</b>	<p><b>UPDATED ADVICE</b></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. <a href="#">This value will not be lost; however, it will become harder to interpret within the AWM setting.</a></p>

<p><b>Impact of the New Southern Entrance (glass lift)</b></p>	<p><b>UPDATED ADVICE</b></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. <a href="#">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.</a></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. <a href="#">If the vegetation is maintained over the long term</a>, this will reduce the impact of the glass lift somewhat on the heritage values of the Parliament House Vista.</p> <p><a href="#">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.</a></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><b>Impact of the New Southern Entrance (oculus)</b></p>	<p><b>UPDATED ADVICE</b></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). <a href="#">The Main Building's monumental nature will not be lost; however, it will become harder to interpret within the AWM setting.</a></p>
<p><b>Impact of clearing land for a carpark north of Treloar Cres</b></p>	<p><b>UPDATED ADVICE</b></p> <p>The final PD document has added Section 6 (pp.50-62) that suggests land north of Treloar Crescent will be cleared for a carpark, either long term, or for use during construction. Figure 6.5 identifies two Indigenous heritage artefacts within the area proposed to be cleared; p.61 then contradicts the other supplied images (figures 6.3 and 6.4) by stating that 'the two identified Indigenous heritage sites are outside of the project boundary and therefore will not be impacted by the project'. It is clear in comparing Figures 6.3; 6.4 and 6.5 that the Indigenous artefacts are within the area proposed to be cleared for a carpark. Ownership of the land in question is also unclear. Further information is required.</p>
<p><b>Impact of the</b></p>	<p><b>UPDATED ADVICE</b></p>

<b>development as a whole</b>	<p>The proposed redevelopment will add an additional 24,277m<sup>2</sup> 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> <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 <a href="#">by reducing the relative scale of the ceremonial spaces within the landscape</a>.</p>
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**s. 22(1)(a)(ii)**

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**From:** s. 22(1)(a)(ii)  
**Sent:** Wednesday, 30 September 2020 12:39 PM  
**To:** s. 22(1)(a)(ii)  
**Cc:** s. 22(1)(a)(ii)  
**Subject:** RE: Final AWM PD [SEC=OFFICIAL]

Hi s. 22(1)(a)(ii)

Please find updated advice here: <http://spire.environment.gov.au/spire/886644/108642/128/ACT%20-%20Australian%20War%20Memorial%20-%20Management/Line%20area%20advice%20AWM%20redevelopment.docx>

Only change is the removal of the section about the carpark north of Treloar Crescent as we understand this is no longer occurring.

Thanks,  
s. 22(1)(a)(ii)

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Historic Heritage Section, Heritage Branch  
Department of Agriculture, Water and the Environment  
a: GPO Box 858 CANBERRA ACT 2601  
s. 22(1)(a)(ii)



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Hi s. 22(1)(a)(ii) and s. 22(1)(a)(ii)

Below are the links to the final PD after they addressed our comments. They have updated their drawings and there is no carpark proposed north of Treloar Crescent. Could you please finalise your advice based on the documents below?

Thanks so much for your help and advice 😊

Final PD: <http://170715.spire.environment.gov.au/125/2019-8574%20Australian%20War%20Memorial%20Redevelopment,%20Campbell,%20ACT/Assessment-Final%20PD-Sep-29-20.pdf>

Attachments A-J: <http://170715.spire.environment.gov.au/125/2019-8574%20Australian%20War%20Memorial%20Redevelopment,%20Campbell,%20ACT/Assessment-Final%20PD-Att%20A-J-290920.pdf>

Attachment K-S: <http://170715.spire.environment.gov.au/125/2019-8574%20Australian%20War%20Memorial%20Redevelopment,%20Campbell,%20ACT/Assessment-Final%20PD-Att%20K-S-290920.pdf>

s. 22(1)(a)(ii)

Assessment Officer

Environment Assessments NSW, ACT | Environment Approvals Division

**Department of Agriculture, Water and the Environment**

s. 22(1)(a)(ii)

*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.*

**s. 22(1)(a)(ii)**

---

**From:** s. 22(1)(a)(ii)  
**Sent:** Thursday, 1 October 2020 9:28 AM  
**To:** s. 22(1)(a)(ii)  
**Subject:** RE: Final AWM PD [SEC=OFFICIAL]

Thanks s. 22(1)(a)(ii)

So with the updated advice are there any changes to which criterion are being impacted by final design or should we assume it is the same as the referral advice?

Cheers

s. 22(1)(a)(ii)

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**From:** s. 22(1)(a)(ii)  
**Sent:** Wednesday, 30 September 2020 12:39 PM  
**To:** s. 22(1)(a)(ii)  
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Historic Heritage Section, Heritage Branch  
Department of Agriculture, Water and the Environment  
**a:** GPO Box 858 CANBERRA ACT 2601  
**s. 22(1)(a)(ii)**



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**Department of Agriculture, Water and the Environment**

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**From:** s. 22(1)(a)(ii)  
**Sent:** Thursday, 1 October 2020 3:24 PM  
**To:** s. 22(1)(a)(ii)  
**Cc:** s. 22(1)(a)(ii)  
**Subject:** RE: Final AWM PD [SEC=OFFICIAL]

**Categories:** Red Category

Hi s. 22(1)(a)(ii)

I have updated the document at the below link to include a statement about principle 4 of the Heritage Management Principles.

Cheers,

s. 22(1)(a)(ii)

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**Subject:** RE: Final AWM PD [SEC=OFFICIAL]

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Please find updated advice here: <http://spire.environment.gov.au/spire/886644/108642/128/ACT%20-%20Australian%20War%20Memorial%20-%20Management/Line%20area%20advice%20AWM%20redevelopment.docx>

Only change is the removal of the section about the carpark north of Treloar Crescent as we understand this is no longer occurring.

Thanks,

s. 22(1)(a)(ii)

**s. 22(1)(a)(ii)**

Historic Heritage Section, Heritage Branch  
Department of Agriculture, Water and the Environment  
a: GPO Box 858 CANBERRA ACT 2601

s. 22(1)(a)(ii)



---

**From:** s. 22(1)(a)(ii)

**Sent:** Wednesday, 30 September 2020 9:55 AM

**To:** s. 22(1)(a)(ii)

**Subject:** Final AWM PD [SEC=OFFICIAL]

Hi <sup>s. 22(1)(a)(ii)</sup> and <sup>s. 22(1)(a)(ii)</sup>

Below are the links to the final PD after they addressed our comments. They have updated their drawings and there is no carpark proposed north of Treloar Crescent. Could you please finalise your advice based on the documents below?

Thanks so much for your help and advice 😊

Final PD: <http://170715.spire.environment.gov.au/125/2019-8574%20Australian%20War%20Memorial%20Redevelopment,%20Campbell,%20ACT/Assessment-Final%20PD-Sep-29-20.pdf>

Attachments A-J: <http://170715.spire.environment.gov.au/125/2019-8574%20Australian%20War%20Memorial%20Redevelopment,%20Campbell,%20ACT/Assessment-Final%20PD-Att%20A-J-290920.pdf>

Attachment K-S: <http://170715.spire.environment.gov.au/125/2019-8574%20Australian%20War%20Memorial%20Redevelopment,%20Campbell,%20ACT/Assessment-Final%20PD-Att%20K-S-290920.pdf>

s. 22(1)(a)(ii)

Assessment Officer

Environment Assessments NSW, ACT | Environment Approvals Division

**Department of Agriculture, Water and the Environment**

s. 22(1)(a)(ii)

*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.*

**s. 22(1)(a)(ii)**

---

**From:** s. 22(1)(a)(ii)  
**Sent:** Thursday, 1 October 2020 4:14 PM  
**To:** s. 22(1)(a)(ii)  
**Cc:** s. 22(1)(a)(ii)  
**Subject:** RE: Final AWM PD [SEC=OFFICIAL]

Thanks <sup>s. 22(1)(a)(ii)</sup>

I don't think we have any further queries and we will use this as the final advice from Heritage.

Thanks again for all your help

<sup>s. 22(1)(a)(ii)</sup>

---

**From:** s. 22(1)(a)(ii)  
**Sent:** Thursday, 1 October 2020 3:54 PM  
**To:** s. 22(1)(a)(ii)  
**Cc:** s. 22(1)(a)(ii)  
**Subject:** RE: Final AWM PD [SEC=OFFICIAL]

Hello,

Updated to also include a brief statement about principle 5 based on our discussion this morning.

Thanks,

<sup>s. 22(1)(a)(ii)</sup>

**s. 22(1)(a)(ii)**

Historic Heritage Section, Heritage Branch  
Department of Agriculture, Water and the Environment  
**a:** GPO Box 858 CANBERRA ACT 2601  
**s. 22(1)(a)(ii)**



---

**From:** s. 22(1)(a)(ii)  
**Sent:** Thursday, 1 October 2020 3:40 PM  
**To:** s. 22(1)(a)(ii)  
**Cc:** s. 22(1)(a)(ii)  
**Subject:** RE: Final AWM PD [SEC=OFFICIAL]

Thanks <sup>s. 22(1)(a)(ii)</sup> are there any changes about Principle 5?

---

**From:** s. 22(1)(a)(ii)  
**Sent:** Thursday, 1 October 2020 3:24 PM  
**To:** s. 22(1)(a)(ii)

Cc: s. 22(1)(a)(ii)

Subject: RE: Final AWM PD [SEC=OFFICIAL]

Hi s. 22(1)(a)(ii)

I have updated the document at the below link to include a statement about principle 4 of the Heritage Management Principles.

Cheers,

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

Historic Heritage Section, Heritage Branch  
Department of Agriculture, Water and the Environment

a: GPO Box 858 CANBERRA ACT 2601

s. 22(1)(a)(ii)



---

From: s. 22(1)(a)(ii)

Sent: Wednesday, 30 September 2020 12:39 PM

To: s. 22(1)(a)(ii)

Cc: s. 22(1)(a)(ii)

Subject: RE: Final AWM PD [SEC=OFFICIAL]

Hi s. 22(1)(a)(ii)

Please find updated advice here: <http://spire.environment.gov.au/spire/886644/108642/128/ACT%20-%20Australian%20War%20Memorial%20-%20Management/Line%20area%20advice%20AWM%20redevelopment.docx>

Only change is the removal of the section about the carpark north of Treloar Crescent as we understand this is no longer occurring.

Thanks,

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

Historic Heritage Section, Heritage Branch  
Department of Agriculture, Water and the Environment

a: GPO Box 858 CANBERRA ACT 2601

s. 22(1)(a)(ii)



---

**From:** s. 22(1)(a)(ii)

**Sent:** Wednesday, 30 September 2020 9:55 AM

**To:** s. 22(1)(a)(ii)

**Subject:** Final AWM PD [SEC=OFFICIAL]

Hi <sup>s. 22(1)(a)(ii)</sup> and <sup>s. 22(1)(a)(ii)</sup>

Below are the links to the final PD after they addressed our comments. They have updated their drawings and there is no carpark proposed north of Treloar Crescent. Could you please finalise your advice based on the documents below?

Thanks so much for your help and advice 😊

Final PD: <http://170715.spire.environment.gov.au/125/2019-8574%20Australian%20War%20Memorial%20Redevelopment,%20Campbell,%20ACT/Assessment-Final%20PD-Sep-29-20.pdf>

Attachments A-J: <http://170715.spire.environment.gov.au/125/2019-8574%20Australian%20War%20Memorial%20Redevelopment,%20Campbell,%20ACT/Assessment-Final%20PD-Att%20A-J-290920.pdf>

Attachment K-S: <http://170715.spire.environment.gov.au/125/2019-8574%20Australian%20War%20Memorial%20Redevelopment,%20Campbell,%20ACT/Assessment-Final%20PD-Att%20K-S-290920.pdf>

s. 22(1)(a)(ii)

Assessment Officer

Environment Assessments NSW, ACT | Environment Approvals Division

**Department of Agriculture, Water and the Environment**

s. 22(1)(a)(ii)

*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.*

<b>Additional Heritage line area advice on Australian War Memorial redevelopment – 21/09/20</b>	
To be read in conjunction with Heritage line area advice 9/12/19	
<b>Impact of Demolition of the Original Anzac Hall</b>	<p><b><u>ADVICE UNCHANGED</u></b></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>
<b>Impact of New Anzac Hall</b>	<p><b><u>UPDATED ADVICE</u></b></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>
<b>Impact of the Glazed Link</b>	<p><b><u>UPDATED ADVICE</u></b></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><b>Impact of the New Southern Entrance (glass lift)</b></p>	<p><b><u>UPDATED ADVICE</u></b></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><b>Impact of the New Southern Entrance (oculus)</b></p>	<p><b><u>UPDATED ADVICE</u></b></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><b>Impact of the development as a whole</b></p>	<p><b><u>UPDATED ADVICE</u></b></p> <p>The proposed redevelopment will add an additional 24,277m<sup>2</sup> 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 4.](#)

[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 5.](#)

**s. 22(1)(a)(ii)**

---

**From:** s. 22(1)(a)(ii)  
**Sent:** Tuesday, 6 October 2020 11:01 AM  
**To:** s. 22(1)(a)(ii)  
**Subject:** RE: Final AWM PD [SEC=OFFICIAL]

All good <sup>s. 22(1)(a)(ii)</sup> I spoke with s. 22(1)(a)(ii)  
Cheers  
<sup>s. 22(1)(a)(ii)</sup>

---

**From:** s. 22(1)(a)(ii)  
**Sent:** Tuesday, 6 October 2020 10:36 AM  
**To:** s. 22(1)(a)(ii)  
**Cc:** s. 22(1)(a)(ii) >  
**Subject:** RE: Final AWM PD [SEC=OFFICIAL]

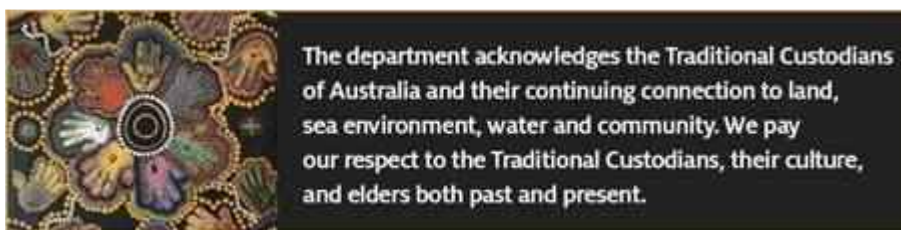
Hi <sup>s. 22(1)(a)(ii)</sup>

Sorry! I was on leave on Friday.  
Did this get sorted, or shall I look into it now for you?

Ta,  
<sup>s. 22(1)(a)(ii)</sup>

**s. 22(1)(a)(ii)**

Historic Heritage Section, Heritage Branch  
Department of Agriculture, Water and the Environment  
**a:** GPO Box 858 CANBERRA ACT 2601  
**s. 22(1)(a)(ii)**



---

**From:** s. 22(1)(a)(ii)  
**Sent:** Thursday, 1 October 2020 5:12 PM  
**To:** s. 22(1)(a)(ii)  
**Cc:** s. 22(1)(a)(ii)  
**Subject:** RE: Final AWM PD [SEC=OFFICIAL]

Hi <sup>s. 22(1)(a)(ii)</sup>

Sorry, one more question about the updated advice. As I have been drafting the section on NHL, I was trying to figure out if their mitigation measures for impacts to the main building fabric and maintaining the primacy of the main entrance from new southern entrance works has reduced the impact to an acceptable level. The original referral advice considered impacts to Main building fabric to be moderate to high, but this was in the absence of mitigation measures. The impact on the primacy of the front entrance was also high, and the original referral advice

stated there are no mitigation measures proposed. They have now proposed and committed to mitigation measures to manage main building fabric and mitigation measures to promote the original main entrance – would this now reduce these impact identified in the referral advice?

Cheers

s. 22(1)(a)(ii)

---

**From:** s. 22(1)(a)(ii)

**Sent:** Thursday, 1 October 2020 3:54 PM

**To:** s. 22(1)(a)(ii)

**Cc:** s. 22(1)(a)(ii)

**Subject:** RE: Final AWM PD [SEC=OFFICIAL]

Hello,

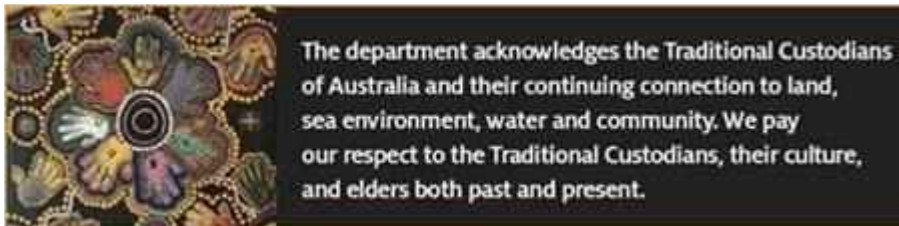
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s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

Historic Heritage Section, Heritage Branch  
Department of Agriculture, Water and the Environment  
a: GPO Box 858 CANBERRA ACT 2601  
s. 22(1)(a)(ii)



---

**From:** s. 22(1)(a)(ii)

**Sent:** Thursday, 1 October 2020 3:40 PM

**To:** s. 22(1)(a)(ii)

**Cc:** s. 22(1)(a)(ii)

**Subject:** RE: Final AWM PD [SEC=OFFICIAL]

Thanks <sup>s. 22(1)(a)(ii)</sup> are there any changes about Principle 5?

---

**From:** s. 22(1)(a)(ii)

**Sent:** Thursday, 1 October 2020 3:24 PM

**To:** s. 22(1)(a)(ii)

**Cc:** s. 22(1)(a)(ii)

**Subject:** RE: Final AWM PD [SEC=OFFICIAL]

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I have updated the document at the below link to include a statement about principle 4 of the Heritage Management Principles.

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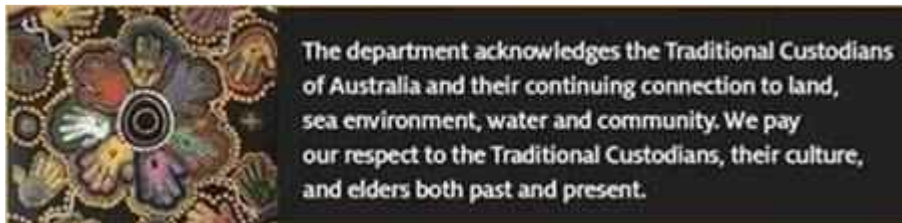
s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

Historic Heritage Section, Heritage Branch  
Department of Agriculture, Water and the Environment

a: GPO Box 858 CANBERRA ACT 2601

s. 22(1)(a)(ii)



---

**From:** s. 22(1)(a)(ii)

**Sent:** Wednesday, 30 September 2020 12:39 PM

**To:** s. 22(1)(a)(ii)

**Cc:** s. 22(1)(a)(ii)

**Subject:** RE: Final AWM PD [SEC=OFFICIAL]

Hi s. 22(1)(a)(ii)

Please find updated advice here: <http://spire.environment.gov.au/spire/886644/108642/128/ACT%20-%20Australian%20War%20Memorial%20-%20Management/Line%20area%20advice%20AWM%20redevelopment.docx>

Only change is the removal of the section about the carpark north of Treloar Crescent as we understand this is no longer occurring.

Thanks,

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

Historic Heritage Section, Heritage Branch  
Department of Agriculture, Water and the Environment

a: GPO Box 858 CANBERRA ACT 2601

s. 22(1)(a)(ii)



---

**From:** s. 22(1)(a)(ii)

**Sent:** Wednesday, 30 September 2020 9:55 AM

**To:** s. 22(1)(a)(ii)

**Subject:** Final AWM PD [SEC=OFFICIAL]

Hi <sup>s. 22(1)(a)(i)</sup> and <sup>s. 22(1)(a)(ii)</sup>

Below are the links to the final PD after they addressed our comments. They have updated their drawings and there is no carpark proposed north of Treloar Crescent. Could you please finalise your advice based on the documents below?

Thanks so much for your help and advice 😊

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**s. 22(1)(a)(ii)**

Assessment Officer

Environment Assessments NSW, ACT | Environment Approvals Division

**Department of Agriculture, Water and the Environment**

**s. 22(1)(a)(ii)**

*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.*

Document 9

**s. 22(1)(a)(ii)**

---

**From:** s. 22(1)(a)(ii)  
**Sent:** Tuesday, 8 September 2020 3:15 PM  
**To:** s. 22(1)(a)(ii)  
**Subject:** RE: AWM Heritage Management Plan [SEC=OFFICIAL]

**Follow Up Flag:** Follow up  
**Due By:** Wednesday, 9 September 2020 8:30 AM  
**Flag Status:** Flagged

Hi  
s. 22(1)(a)(ii)

s. 47C(1)

Cheers  
s. 22(1)(a)(ii)

---

**From:** s. 22(1)(a)(ii)  
**Sent:** Tuesday, 8 September 2020 2:08 PM  
**To:** s. 22(1)(a)(ii)  
**Subject:** RE: AWM Heritage Management Plan [SEC=OFFICIAL]

Hi s. 22(1)(a)(ii)  
Great context.

s. 22(1)(a)(ii)

s. 47C(1)

s. 22(1)(a)(ii) – have you been in a similar situation before? What are your views?

Cheers  
s. 22(1)

---

**From:** s. 22(1)(a)(ii)  
**Sent:** Tuesday, 8 September 2020 1:23 PM  
**To:** s. 22(1)(a)(ii)  
**Subject:** AWM Heritage Management Plan [SEC=OFFICIAL]

Hi s. 22(1)(a)(ii) and s. 22(1)(a)(ii)

I spoke with Heritage regarding Heritage Management Plans:

- All Commonwealth agency owned and/or National Heritage places must prepare a Heritage Mgt Plan
- The plan must be approved by the Australian Heritage Council and the Minister. There is a public consultation element to the plan approval process.

- There is an extra step to make the plan statutory under the EPBC Act – which is to register it as a gazettal notice. This step is the responsibility of the agency/national heritage place, and is often not done for many national heritage places.
- If it is not made into a statutory plan, it becomes essentially an ‘internal plan’ for the agency/national heritage place to manage onsite works in relation to heritage impacts. Non compliance with this plan does therefore not have much consequence unless it is made statutory.
- If it is made statutory then the Minister cannot act inconsistently with the plan and cannot approve actions which are non-compliant with the plan.
- The AWM plan was approved by the Department and the AHC in 2011 during **s. 47F(1)** but was not and has still not been made a statutory plan under the EPBC Act, which is the responsibility of the AWM.
- **s. 22(1)(a)(ii)**

**s. 47C(1)**

Regards

**s. 22(1)(a)(ii)**

**s. 22(1)(a)(ii)**

Assessment Officer

Environment Assessments NSW, ACT | Environment Approvals Division

**Department of Agriculture, Water and the Environment**

**s. 22(1)(a)(ii)**

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**s. 22(1)(a)(ii)**

---

**From:** Louise Vickery  
**Sent:** Wednesday, 19 August 2020 2:33 PM  
**To:** s. 22(1)(a)(ii)  
**Cc:** s. 22(1)(a)(ii)  
**Subject:** FW: Response to s. 47F(1) - Australian War Memorial redevelopment - EPBC Referral [SEC=OFFICIAL]  
**Attachments:** 200817 - Letter to s. 47F(1) - AWM redevelopment EPBC referral.pdf; 200817 - Minute - Response to s. 47F(1) Australian War Memorial redevelopment proposal EPBC Referral.pdf

Nice work team.

Regards Louise

---

**From:** s. 22(1)(a)(ii)  
**Sent:** Wednesday, 19 August 2020 1:38 PM  
**To:** Louise Vickery <Louise.Vickery@environment.gov.au>  
**Cc:** s. 22(1)(a)(ii)  
**Subject:** FW: Response to s. 47F(1) - Australian War Memorial redevelopment - EPBC Referral [SEC=OFFICIAL]

Hi <sup>s. 22(1)(a)(ii)</sup>

Please see the attached letter signed by the Secretary for your records.

Kind regards,

s. 22(1)(a)(ii)  
(A/g) Executive Assistant to James Larsen | Deputy Secretary  
Environment & Heritage Group  
Department of Agriculture, Water and the Environment

s. 22(1)(a)(ii)

---

**From:** s. 22(1)(a)(ii)  
**Sent:** Monday, 17 August 2020 6:16 PM  
**To:** s. 22(1)(a)(ii)  
**Subject:** Response to s. 47F(1) - Australian War Memorial redevelopment - EPBC Referral [SEC=OFFICIAL]

Hi <sup>s. 22(1)(a)(ii)</sup>

Andrew has signed the minute and letter. Hard copy of the letter has gone into snail mail to <sup>s. 47F(1)</sup>

s. 22(1)(a)(ii)  
Executive Assistant to Andrew Metcalfe AO  
Secretary  
Department of Agriculture, Water and the Environment  
GPO Box 858  
Canberra ACT 2601  
s. 22(1)(a)(ii)



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Australian Government  
Department of Agriculture,  
Water and the Environment

ANDREW METCALFE AO  
SECRETARY

August 2020

s. 47F(1)

Dear s. 47F(1)

s. 22(1)(a)(ii)

s. 22(1)(a)(ii) This will also include consideration of National and Commonwealth Heritage management principles and any heritage plan that has been prepared under the EPBC Act.

In relation to the AWM's approved heritage management plan, it was adopted by the Commonwealth and the Australian Heritage Council but was not made into a legislative instrument. In that context, unlike the heritage values and management principles, the plan is not a statutory consideration under the EPBC Act. However, the Minister will consider the AWM's compliance with the plan as part of the broader consideration of the impacts of the proposal.

s. 22(1)(a)(ii)

Best wishes

s. 47F(1)

Andrew Metcalfe AO

s. 47F(1)

To: Andrew Metcalfe (For Signature)

Through: James Larsen, Deputy Secretary, Environment

s. 47F(1)

Cc: s. 22(1)(a)(ii)

REPLY TO s. 47F(1)

s. 47F(1) - AUSTRALIAN WAR MEMORIAL REDEVELOPMENT, EPBC REFERRAL 2019-8574

Timing: August 17<sup>th</sup> 2020.

**Recommendation:**

1. Sign the draft reply to s. 47F(1) s. 47F(1) acknowledging his concerns regarding the redevelopment proposal's impact on National and Commonwealth heritage values of the Memorial and outlining the Minister's considerations in making a final decision (**Attachment A**).

Signed / Not signed

Signatory: s. 47F(1) Date: 27/8/20

Comments: s. 47F(1)

<b>Clearing Officer:</b> Sent 110820	Louise Vickery	Assistant Secretary, Environment Approvals Division, Environment Assessments (NSW, ACT) Branch	s. 47F(1)
Contact Officer:	s. 22(1)(a)(ii)	Director, ACT Assessments	s. 22(1)(a)(ii)

Key Points:

s. 22(1)(a)(ii)

# s. 22(1)(a)(ii)

- b. Minister will consider the AWM's compliance with its heritage management plan, although it is not legally required as the plan has no statutory basis

# s. 22(1)(a)(ii)

**s. 42(1), s. 22(1)(a)(ii)**

s. 42(1), s. 22(1)(a)(ii)

s. 42(1), s. 22(1)(a)(ii)

s. 42(1), s. 22(1)(a)(ii)



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**s. 22(1)(a)(ii)**

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**s. 22(1)(a)(ii)**

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s. 22(1)(a)(ii)

# s. 22(1)(a)(ii)

A plan that has been prepared for the management of a National Heritage place

132.s. 42(1)

by both the Commonwealth and the Australian Heritage Council for the management of the Australian War Memorial in 2011. However, this plan was not made ~~into a~~by legislative instrument in accordance with section 324S(7) -and therefore is not considered a plan for the purposes of s137A of the EPBC Act.

133-135. Irrespective of its legal status, the HIA includes an analysis of the proposed action against the policies contained in the Heritage Management Plan 2011. The HIA concludes that the proposed development partially complies with the following policies, mainly in relation due to impacts to the Main Building fabric from the New Southern Entrance and the demolition of Anzac Hall (NHL Criteria (a) and (e) and CHL Criteria (d)):

## s. 42(1)

## EPBC 2019/8574

## Attachment A

- a. The identified heritage values of the site will be the principle basis for all future planning (policy 1.1.2).
- b. All new developments must contribute to the heritage values of the site and its qualities as a unique place of symbolic importance to the nation (policy 1.3). The HIA states that the overall proposed development contributes positively to the social, research and rarity values of the site. The proposed footprint of Anzac Hall will be improved as the building footprint will line up with the extremities of the Main Building transepts.
- c. The integrity of the fabric of heritage values from different phases must be maintained, managed and interpreted (policy 1.9.1).
- d. Ensure development proposals or changes avoid and mitigate impacts on the heritage values of the Memorial. Heritage expertise and guidance should be included in the design development process (policy 1.12.3). The proposed action avoids some impacts and mitigates others. The loss of Anzac Hall will be mitigated to an extent by a replacement building of similar function.
- e. Protect and manage the mature native trees in the Eastern Precinct in the context of its future redevelopment and improvement (1.3.1). This relates to the landscape context of the Memorial site recognised in NHL criteria (a), (b), (e), (g) and CHL Criteria (a), (e), (f), (g) and (h). Partial compliance relates to the loss of two mature *Eucalyptus melliodora* trees in the Eastern Precinct. All replacement trees will be species native to the site.

**134-136.** The HIA concludes that the proposed action is not compliant with the following policies:

- a. Ensure that any new development within the Memorial's Campbell Precinct does not impinge on the silhouette of the Memorial as perceived from the land axis and that their height is less than the parapet of the Memorial's main building (Policy 1.11.2). The proposed action does not comply with this policy due to the height of the Glazed Link dome and new Anzac Hall roof rising slightly above the parapet of the Main Building following mitigation measures to reduce their heights from the original proposal.
- b. Conserve, manage and interpret the Anzac Hall as part of the Memorial's Main Building (Policy 1.11). As the proposed action involves the demolition of Anzac Hall, it does not comply with this policy.

**135-137.** The Department considers that the elements of the proposal that do not comply with the Memorial's Heritage Management Plan have been mitigated to a high degree to minimise the impacts. Other elements of the site will continue to s. 42(1) criterion (e) of the NHL values in the absence of Anzac Hall.

s. 42(1)

s. 22(1)(a)(ii)



s. 22(1)(a)(ii)

**s. 42(1), s. 22(1)(a)(ii)**

s. 42(1), s. 22(1)(a)(ii)

s. 42(1), s. 22(1)(a)(ii)

**s. 42(1), s. 22(1)(a)(ii)**

s. 42(1), s. 22(1)(a)(ii)

s. 42(1), s. 22(1)(a)(ii)

s. 42(1), s. 22(1)(a)(ii)



**S. 42(1)**

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Document 13b

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# s. 22(1)(a)(ii)

<p>17. Within 12 months of the <b>completion of the action</b>, the <b>approval holder</b> must revise the approved site <b>Heritage Management Plan (HMP)</b> prepared under sections 324S and 341S of the <b>EPBC Act</b> and submit the revised <b>HMP</b> to the <b>Minister</b> and the <b>Australian Heritage Council</b> for approval. Following approval from the <b>Minister</b> and the <b>Australian Heritage Council</b>, the <b>approval holder</b> must register the approved revised <b>HMP</b> as a legislative instrument under section 137A of the <b>EPBC Act</b>.</p>	
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# s. 42(1)

# s. 22(1)(a)(ii)

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# s. 22(1)(a)(ii)

A plan that has been prepared for the management of a National Heritage place

138. [s. 42\(1\)](#)

139. Irrespective of its legal status, the HIA includes an analysis of the proposed action against the policies contained in the Heritage Management Plan 2011. The HIA concludes that the proposed development partially complies with the following policies, mainly in relation to impacts to the Main Building fabric from the New Southern Entrance and the demolition of Anzac Hall (NHL Criteria (a) and (e) and CHL Criterion (d)):

# s. 42(1)

- a) The identified heritage values of the site will be the [principal](#) basis for all future planning (policy 1.1.2). The proposed action partially complies with this policy, as there are elements of the action that will impact on the heritage values of the site. Proposed mitigation measures will reduce the impacts.
- b) All new developments must contribute to the heritage values of the site and its qualities as a unique place of symbolic importance to the nation (policy 1.3). Overall, the proposed action will contribute to the heritage values of the site by providing additional space for the equitable display of all conflicts and providing improved access for people with mobility issues. The new elements will utilise materials and finishes sympathetic to the existing built form and impacts to the Main Building have been minimised by the creation of a subterranean entrance. The HIA states that the overall proposed development contributes positively to the social, research and rarity values of the site. And the proposed footprint of Anzac Hall will be improved as the building footprint will line up with the extremities of the Main Building transepts. The demolition of Anzac Hall and the impact on the landscape setting of the Memorial results in partial compliance with this policy.
- c) The integrity of the fabric of heritage values from different phases must be maintained, managed and interpreted (policy 1.9.1). The HIA states that the stone façade of the Main Building will not be impacted and measures have been proposed to mitigate impacts to other Main Building fabric (stairs, forecourt and entry paving etc). The main loss of fabric will occur from the demolition of Anzac Hall.
- d) Ensure development proposals or changes avoid and mitigate impacts on the heritage values of the Memorial. Heritage expertise and guidance should be included in the

EPBC 2019/8574

Attachment A

design development process (policy 1.12.3). The proposed action avoids some impacts and mitigates others. The AWM has engaged with architects, heritage consultants and stone consultants to guide the design process. The loss of Anzac Hall results in partial compliance with this policy, although will be mitigated to an extent by a replacement building of similar function.

- e) Protect and manage the mature native trees in the Eastern Precinct in the context of its future redevelopment and improvement (1.3.1). This relates to the landscape contest of the Memorial site recognised in NHL Criteria (a), (b), (e), (g) and CHL Criteria (a), (e), (f), (g) and (h). Partial compliance relates to the loss vegetation at the site including two mature *Eucalyptus melliodora* trees in the Eastern Precinct (**Attachment C10**). The AWM states that all replacement trees will be species native to the site.
140. The HIA concludes that the proposed action is not compliant with the following policies:
- a) Ensure that any new development within the Memorial's Campbell Precinct does not impinge on the silhouette of the Memorial as perceived from the land axis and that their height is less than the parapet of the Memorial's main building (Policy 1.11.2). The proposed action does not comply with this policy due to the height of the Glazed Link dome and new Anzac Hall roof rising above the parapet of the Main Building.
- b) Conserve, manage and interpret the Anzac Hall as part of the Memorial's Main Building (Policy 1.11). The proposed action does not comply with this policy due to the demolition of Anzac Hall. The impact is proposed to be mitigated to an extent by the photographic archival recording of the existing Anzac Hall and research projects to document the public memories of Anzac Hall and the architectural interpretation of the development of the site.
141. The Department generally agrees with the HIA<sup>2</sup> assessment of the action in terms of compliance with the HMP policies. Anzac Hall will not be conserved, resulting in the loss of an element of criterion (e) of the NHL values. However the Department considers that other elements of the site will continue to demonstrate criterion (e) of the NHL values in the absence of Anzac Hall such as the Main Building and the surrounding landscape, the Hall of Memory, the Roll of Honour, the collections, and the site together with Anzac Parade as part of the Parliament House vista. The contribution of Anzac Hall to the NHL values of the Memorial will be preserved via archival recording and documented memories and as such it will continue to be presented and transmitted to future generations in alignment with the Commonwealth and National Heritage Management Principles.

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**s. 42(1), s. 22(1)(a)(ii)**

s. 42(1), s. 22(1)(a)(ii)

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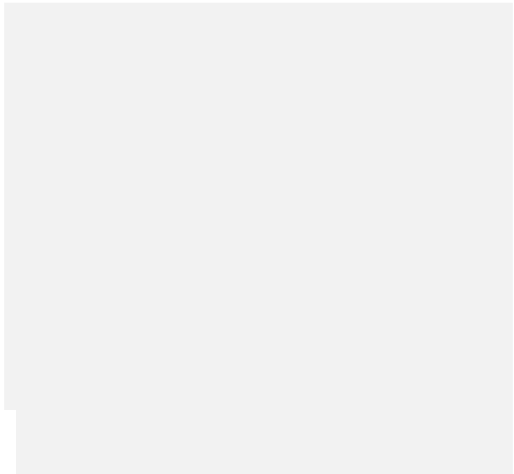
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Heritage Management Plan

# s. 42(1)

133. s. 42(1)

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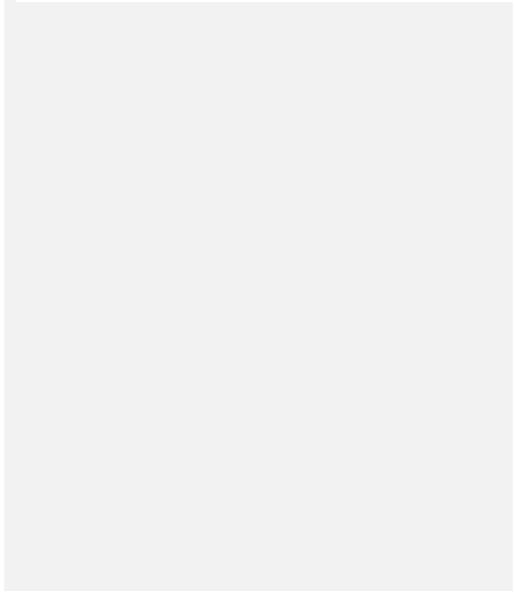
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134. s. 42(1) The HIA includes an analysis of the proposed action against the policies contained in the Heritage Management Plan 2011 (HMP). The HIA concludes that the proposed development partially complies with some policies and is non-compliant with other policies of the HMP. The HIA states partial compliance with the following policies, mainly in relation to impacts to the Main Building fabric from the New Southern Entrance and the demolition of Anzac Hall (NHL Criteria (a) and (e) and CHL Criterion (d)):

- a) The identified heritage values of the site will be the principal basis for all future planning (policy 1.1.2). The proposed action partially complies with this policy, as there are elements of the action that will impact on the heritage values of the site. Proposed mitigation measures will reduce the impacts.
- b) All new developments must contribute to the heritage values of the site and its qualities as a unique place of symbolic importance to the nation (policy 1.3). Overall, the proposed action will contribute to the heritage values of the site by providing additional space for the equitable display of all conflicts and providing improved access for people with mobility issues. The new elements will utilise materials and finishes sympathetic to the existing built form and impacts to the Main Building have been minimised by the creation of a subterranean entrance. The HIA states that the overall proposed development contributes positively to the social, research and rarity values of the site.



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Attachment A

And the proposed footprint of Anzac Hall will be improved as the building footprint will line up with the extremities of the Main Building transepts. The demolition of Anzac Hall and the impact on the landscape setting of the Memorial results in partial compliance with this policy.

- c) The integrity of the fabric of heritage values from different phases must be maintained, managed and interpreted (policy 1.9.1). The HIA states that the stone façade of the Main Building will not be impacted and measures have been proposed to mitigate impacts to other Main Building fabric (stairs, forecourt and entry paving etc).The main loss of fabric will occur from the demolition of Anzac Hall.
- d) Ensure development proposals or changes avoid and mitigate impacts on the heritage values of the Memorial. Heritage expertise and guidance should be included in the design development process (policy 1.12.3). The proposed action avoids some impacts and mitigates others. The AWM has engaged with architects, heritage consultants and stone consultants to guide the design process. The loss of Anzac Hall results in partial compliance with this policy, although will be mitigated to an extent by a replacement building of similar function.
- e) Protect and manage the mature native trees in the Eastern Precinct in the context of its future redevelopment and improvement (1.3.1). This relates to the landscape contest of the Memorial site recognised in NHL Criteria (a), (b), (e), (g) and CHL Criteria (a), (e), (f), (g) and (h). Partial compliance relates to the loss vegetation at the site including two mature *Eucalyptus melliodora* trees in the Eastern Precinct (**Attachment C10**). The AWM states that all replacement trees will be species native to the site.

135. The HIA concludes that the proposed action s. 42(1) the following policies:

- a) Ensure that any new development within the Memorial's Campbell Precinct does not impinge on the silhouette of the Memorial as perceived from the land axis and that their height is less than the parapet of the Memorial's main building (Policy 1.11.2). The proposed action does not comply with this policy due to the height of the Glazed Link dome and new Anzac Hall roof rising above the parapet of the Main Building.
- b) Conserve, manage and interpret the Anzac Hall as part of the Memorial's Main Building (Policy 1.11). The proposed action does not comply with this policy due to the demolition of Anzac Hall. The impact is proposed to be mitigated to an extent by the photographic archival recording of the existing Anzac Hall and research projects to document the public memories of Anzac Hall and the architectural interpretation of the development of the site.

s. 42(1)

136. The Department generally agrees with the HIA's assessment of the action in terms of s. 42(1) with the HMP policies.

a. The Department considers that the proposed action s. 42(1) with the HMP as Anzac Hall will not be conserved and is proposed to be demolished. However, the contribution of Anzac Hall to the values of the site will be conserved via archival recording and documented memories and as such it will continue to be presented and transmitted to future generations in alignment with the Commonwealth Management Principles (Condition 5).

s. 42(1)

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EPBC 2019/8574

Attachment A

b. The Department also considers that proposed action does not complydeparts from with the HMP as the rooves of both the Glazed Link and Anzac Hall will rise above the parapet of the Main Building and will be visible along the Parliament House vista. While the proponent has reduced the height of these rooves as much as practically possible, the impact cannot be completely mitigated.

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136-137. Though the proposed action departs from some of the policies set out in the HMP, as explained in this report, the Department is satisfied that if the proposed action is undertaken in accordance with the recommended conditions, then it will not have unacceptable impacts on the Commonwealth and National Heritage values of the AWM. Further, the Department is satisfied that the recommended decision is not inconsistent with the Commonwealth Heritage Management Principles and the National Heritage Management Principles.

s. 22(1)(a)(ii)

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A plan that has been prepared for the management of a National Heritage place

181. s. 42(1)

EPBC 2019/8574

Attachment A

182. s. 42(1)

180. A management plan was prepared and adopted by both the Commonwealth and the Australian Heritage Council for the management of the national heritage values of the Australian War Memorial in 2011 under section 324S of the EPBC Act. However, this plan was not registered as a legislative instrument on the Federal Register of Legislation in accordance with section 15H of the *Legislation Act 2003* and therefore is not considered a plan for your consideration under s137A of the EPBC Act. The same plan applies to the Memorial as a Commonwealth Heritage place and discussion of compliance of the proposed action in relation to the HMP is provided in paragraphs 133-137.

181. Irrespective of its legal status, the proposed action is not compliant with the HMP as Anzac Hall will be demolished. However the Department considers that other elements of the site will continue to demonstrate criterion (e) of the NHL values in the absence of Anzac Hall such as the Main Building and the surrounding landscape, the Hall of Memory, the Roll of Honour, the collections, and the site together with Anzac Parade as part of the Parliament House vista. The contribution of Anzac Hall to the NHL values of the Memorial will be preserved via archival recording and documented memories (Condition 5) and as such it will continue to be presented and transmitted to future generations in alignment with the Commonwealth and National Heritage Management Principles.

182. The proposed action is not compliant with the HMP as the rooves of both the Anzac Hall and Glazed Link will rise above the parapet of the Main Building and will be visible along the CHL listed Parliament House Vista. While the proponent has reduced the height of these rooves as much as practically possible, the impact cannot be completely mitigated.

183. To ensure the HMP can be legally considered under s 137A of the EPBC act in future site amendments, the Department has proposed condition 17, which requires the proponent to update the existing site HMP prepared under s 324S of the EPBC Act, and submit a request to the Minister to lodge the plan for registration as a legal instrument under s 15H of the *Legislation Act 2003*.

s. 22(1)(a)(ii)

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**s. 42(1), s. 22(1)(a)(ii)**

s. 42(1), s. 22(1)(a)(ii)

**S. 42(1)**



**S. 42(1)**

# S. 42(1)

**S. 42(1)**

s. 22(1)(a)(ii)

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**From:** s. 22(1)(a)(ii)  
**Sent:** Friday, 6 November 2020 11:59 AM  
**To:** s. 22(1)(a)(ii)  
**Subject:** AWM HMP CORRO SEC=Official  
**Attachments:** AWM HMP FILES\_11\_58\_47-06\_11\_2020.pdf

Please find your scan attached to this Email.



## Australian Government

Department of the Environment, Water, Heritage and the Arts

Rhonda Adler  
Assistant Director  
Branch Head Corporate Services  
Australian War Memorial  
GPO Box 345  
CANBERRA ACT 2601

Dear Ms Adler

### Australian War Memorial - Final Draft Heritage Management Plan

I refer to your letter of 19 October 2010 providing a copy of the final draft management plan for the Australian War Memorial (AWM) to the Minister for Sustainability, Environment, Water, Population and Communities for consideration in accordance with sub section 341S(6) of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

In accordance with sub sections 324S(6)(b) and 341S(7) of the EPBC Act, the Minister has consulted the Australian Heritage Council.

The Council would like to compliment AWM for their work on the management plan. As the Minister's delegate, I am pleased to advise that the AWM Management Plan is consistent with the Commonwealth Heritage management principles and substantially satisfies the obligations under the EPBC Act in accordance with the sub section 341S(3) and (4). I attach some minor amendments that are due to recent departmental and ministerial change (Refer Attachment A).

In order to finalise the management plan, it will be necessary to seek the Minister for Sustainability, Environment, Water, Population and Communities' approval to make the plan and to submit an application for the plan to become a legislative instrument. When you are ready to undertake these steps, please contact Margaret Hammond on Ph 62072596 who will be happy to advise you further.

# s. 22(1)(a)(ii)



s. 22(1)(a)(ii)

Yours sincerely s. 47F(1)

s. 47F(1)

s. 47F(1) Theo Hooy  
Assistant Secretary  
Historic Heritage Branch  
2/December 2010

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)



# s. 22(1)(a)(ii)

**s. 22(1)(a)(ii)**

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**From:** s. 22(1)(a)(ii)  
**Sent:** Thursday, 27 January 2011 11:55 AM  
**To:** s. 22(1)(a)(ii)  
**Subject:** FYI: Australian War Memorial Heritage Management Plan [SEC=UNCLASSIFIED]  
**Categories:** UNCLASSIFIED

Hi s. 22(1)(a)(ii)

s. 47F(1) rang to discuss my e-mail. Is going to finalise the making of the plan for the CH listed place (ie AWM Campbell precinct). I asked if he could let us know when that had been done, so we can update our records.

I added we occasionally got Senate Estimate queries concerning statistics about HMPs, so useful to be able to report if AWM's plan has been finalised or not.

He was a bit disappointed that we could not complete the NH part. I said at least we have everything ready to go if/when NCA prepares a plan for Anzac Parade.

s. 22

**s. 22(1)(a)(ii)**

Assistant Director  
Historic Heritage North Section  
Heritage Division  
Department of Sustainability, Environment, Water, Population and Communities

**s. 22(1)(a)(ii)**

GPO Box 787, CANBERRA ACT 2601

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**From:** s. 22(1)(a)(ii)  
**Sent:** Thursday, 27 January 2011 9:31 AM  
**To:** s. 47F(1)  
**Subject:** Australian War Memorial Heritage Management Plan [SEC=UNCLASSIFIED]

Hi s. 47F(1)

Thanks for your e-mail about the HMP for the AWM. The EPBC Act does not clearly set out the process to be followed after a Heritage Management Plan has been to the Australian Heritage Council. However subsections S324S (7) and 341S (8) of the EPBC Act do state that '*the plan is a legislative instrument*'. This has been interpreted to mean that as a final step an application must be made to the Attorney General (AG) for certification of the plan in accordance with Section 10 of the *Legislative Instruments Act 2003*.

**Management Plan for a Commonwealth Heritage Listed Place - AWM, Campbell Precinct:  
CHL ID 105469**

Only the proponent of the management plan can make an application for the plan to become a legislative instrument. Consequently the Commonwealth Minister (or his delegate) responsible for administering the AWM must apply to the Attorney General (AG) for certification of the plan in accordance with Section 10 of the *Legislative Instruments Act 2003*. We suggest you contact the

27/01/2011

Federal Registration Office at the AG's Department to enquire further about this process.

**Management Plan for a National Heritage Listed Place in a Commonwealth Area - AWM and the Memorial Parade, Anzac Parade:  
NHL ID 105889**

The National Heritage Listed place boundary incorporates both the AWM Campbell Precinct and Anzac Parade. While the EPBC Act allows for more than one plan to be prepared for a National Heritage listed place, it appears that the Environment Minister cannot make a plan for part of a place. This means, under the EPBC Act the Environment Minister is currently unable to apply to the Attorney General (AG) for certification of the plan in accordance with Section 10 of the *Legislative Instruments Act 2003* in the absence of a plan to manage the National Heritage Listed values for Anzac Parade. In short, we have progressed administratively as far as we are able to for now.

I hope that makes sense. Please contact me if you should wish to discuss further.

Regards

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

Assistant Director  
Historic Heritage North Section  
Heritage Division  
Department of Sustainability, Environment, Water, Population and Communities  
s. 22(1)(a)(ii)

GPO Box 787, CANBERRA ACT 2601

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**From:** s. 47F(1)

**Sent:** Thursday, 6 January 2011 2:20 PM

**To:** s. 22(1)(a)(ii)

**Cc:** s. 47F(1)

**Subject:** Australian War Memorial Heritage Management Plan

Hi s. 22(1)(a)(ii)

We have recently been advised by Mr Hooy that in order to finalise our HMP it will be necessary to seek Ministerial approval to make the plan and submit an application for the plan to become a legislative instrument.

Could you please advise the steps to be taken to achieve this. (We anticipate being ready to undertake this process in early –mid February).

Many thanks

s. 47F(1)

s. 47F(1)

Buildings and Services  
Australian War Memorial

s. 47F(1)

27/01/2011



AUSTRALIAN WAR MEMORIAL

s. 47F(1)

Hi s. 47F(1)  
This is in line with  
our advice ie  
cannot progress any  
further with HWP for  
NH listed place (Memorial  
& ANZAC Parade).  
It is a bit ambiguous  
whether AWM are  
expecting a reply or  
whether this is  
for our info

9 March 2011

s. 47F(1)

File 09/2990

Ms Robyn Kruk AM  
Secretary for the Department of  
Sustainability, Environment, Water,  
Population and Communities  
GPO Box 787  
CANBERRA ACT 2601

Dear Ms Kruk

The purpose of my writing to you is to advise that the Memorial has now completed a Heritage Management Plan to meet its statutory requirements under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

You would be aware that the Memorial is listed under both the Commonwealth and National Heritage Lists. The Memorial's Commonwealth listing is *The Australian War Memorial* whilst our National listing is as part of *The Australian War Memorial and the Memorial Parade*. The Australian War Memorial Heritage Management Plan therefore covers our part of the National Heritage List (the National Capital Authority is responsible for completing a Heritage Management Plan for the *Memorial Parade* (ANZAC Parade) component).

On 21 December 2010 we received advice from your Historic Heritage Branch that the Memorial's Heritage Management Plan satisfies the obligations under the EPBC Act and is ready to formally seek the Minister's approval to make the plan. More recently, we have been advised by the Historic Heritage Branch that as the National Heritage List boundary includes both the Australian War Memorial (administered by the Memorial) and ANZAC Parade (administered by the National Capital Authority) the Minister will effectively need to wait for the ANZAC Parade Heritage Management Plan to be completed by the National Capital Authority before making the plan.

In essence, it appears the Memorial has progressed administratively in this matter as far as it is able to and, in this context, we formally submit for the Minister the Australian War Memorial Heritage Management Plan

Yours sincerely

s. 47F(1)

FNH.  
KDP  
16/3/11  
→ Theo



Australian Government

Department of Sustainability, Environment, Water, Population and Communities

C11/2470

s. 47F(1)  
s. 47F(1)

Australian War Memorial  
PO Box 345  
CANBERRA ACT 2601

Dear s. 47F(1)

I refer to your recent correspondence enclosing a copy of the final management plan for the Australian War Memorial (AWM) for the Minister for Sustainability, Environment, Water, Population and Communities. As the Minister's delegate I would like to thank you for the final management plan and take the opportunity to congratulate the AWM on the work undertaken.

While the *Environment Protection and Biodiversity Conservation Act 1999* allows for more than one plan to be prepared for a National Heritage listed place, I have been advised that the Environment Minister cannot make a plan for part of a place. In the absence of a final management plan to manage the National Heritage listed values of ANZAC Parade, I agree that the AWM has fulfilled its heritage obligations under the EPBC Act as far as it is able.

However, as you will be aware the Commonwealth Heritage listing for the AWM is the area known as the Campbell Precinct and does not include ANZAC Parade. In this case I understand that the Commonwealth Minister (or his delegate) responsible for administering the AWM is able to complete the last administrative step in relation to the protection of the Commonwealth Heritage listed values of the AWM Campbell Precinct. This involves an application to the Attorney General for certification of the management plan prepared to protect the Commonwealth Heritage listed values in accordance with Section 10 of the *Legislative Instruments Act 2003*. The Federal Registration Office at the Attorney General's Department should be able to advise further about this process.

Yours sincerely  
s. 47F(1)

s. 47F(1)

s. 47F(1) Theo Hooy  
Assistant Secretary  
Historic Heritage Branch

15 April 2011

s. 47F(1) (GML) rang on behalf of AWM - Confused about legislative instrument. I referred her to the relevant parts of the EPBC Act and advised her to look at AG's website / ring AGs for advice. Sounds like AWM will not progress with making the NP for Campbell Precinct a leg instrument, but will wait for a management plan for ANZAC Parade

(NHL) values to be finalised then aim to do CHL/NHL together s. 22(1)(a)(ii)



**s. 22(1)(a)(ii)**

**s. 22(1)(a)(ii)**

**s. 22(1)(a)(ii)**



# S. 42(1)

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**s. 22(1)(a)(ii)**

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## *Heritage Management Plans and Commonwealth Heritage Management Principles*

**140-137.** Under s 136(1)(a) of the EPBC Act, when making the present decision, you must consider matters relevant to, relevantly, the environment, so far as the matters are not inconsistent with any other requirement of Subdivision B of Division 1 of Part 9. As discussed above, the environment relevantly includes heritage values of places.

**141-138.** Matters relevant to this aspect of the environment include:

- a) The Australian War Memorial Heritage Management Plan Final Report, January 2011, prepared by Godden Mackay Logan, Heritage Consultants for the Australian War Memorial. This document was not **s. 42(1)** registered as a legislative instrument for the purposes of s 341S(8). However, it is nevertheless a matter that is relevant to the heritage values (and in particular, the Commonwealth and National Heritage values) of the Australian War Memorial. A copy of the HMP is at Attachment G for your consideration.

**s. 42(1)**

# s. 22(1)(a)(ii)



EPBC 2019/8574

Attachment A

## Heritage Management Plan

143. The AWM has published a document – the Australian War Memorial Heritage Management Plan, January 2011 – which sets out how the AWM will protect and manage the place's Commonwealth Heritage values and National Heritage values. The HMP is relevant to your decision whether to approve the proposed action, but you are not precluded from approving proposals that depart from or are inconsistent with the HMP. The Department notes that while this plan has been published, it has not been made by the Minister under section 324S of the Act and has not been registered as a legislative instrument under the *Legislation Act 2003*. A copy of the HMP is at **Attachment C** for your consideration.

s. 42(1)

144.140. The HIA includes an analysis of the proposed action against the policies contained in the Heritage Management Plan 2011 (HMP). The HIA states that the proposed development partially complies from some policies of the HMP. The HIA states partial compliance with the following policies, mainly in relation to impacts to the Main Building fabric from the New Southern Entrance and the demolition of Anzac Hall (NHL Criteria (a) and (e) and CHL Criterion (d)):

s. 42(1)

- a) The identified heritage values of the site will be the principal basis for all future planning (policy 1.1.2). The proposed action partially complies with this policy, as there are elements of the action that will impact on the heritage values of the site. Proposed mitigation measures will reduce the impacts.
- b) All new developments must contribute to the heritage values of the site and its qualities as a unique place of symbolic importance to the nation (policy 1.3). Overall, the proposed action will contribute to the heritage values of the site by providing additional space for the equitable display of all conflicts and providing improved access for people with mobility issues. The new elements will utilise materials and finishes sympathetic to the existing built form and impacts to the Main Building have been minimised by the creation of a subterranean entrance. The HIA states that the overall proposed development contributes positively to the social, research and rarity values of the site. And the proposed footprint of Anzac Hall will be improved as the building footprint will line up with the extremities of the Main Building transepts. The demolition of Anzac Hall and the impact on the landscape setting of the Memorial results in partial compliance with this policy.
- c) The integrity of the fabric of heritage values from different phases must be maintained, managed and interpreted (policy 1.9.1). The HIA states that the stone façade of the Main Building will not be impacted and measures have been proposed to mitigate impacts to other Main Building fabric (stairs, forecourt and entry paving etc). The main loss of fabric will occur from the demolition of Anzac Hall.
- d) Ensure development proposals or changes avoid and mitigate impacts on the heritage values of the Memorial. Heritage expertise and guidance should be included in the design development process (policy 1.12.3). The proposed action avoids some impacts and mitigates others. The AWM has engaged with architects, heritage consultants and stone consultants to guide the design process. The loss of Anzac Hall

Heritage place, the Commonwealth and Commonwealth agency must take all reasonable steps to ensure that its acts are not inconsistent with the Commonwealth Heritage management principles.

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Attachment A

results in partial compliance this policy, although will be mitigated to an extent by a replacement building of similar function.

- e) Protect and manage the mature native trees in the Eastern Precinct in the context of its future redevelopment and improvement (1.3.1). This relates to the landscape context of the Memorial site recognised in NHL Criteria (a), (b), (e), (g) and CHL Criteria (a), (e), (f), (g) and (h). Partial compliance relates to the loss vegetation at the site including two mature *Eucalyptus melliodora* trees in the Eastern Precinct (**Attachment C10**). The AWM states that all replacement trees will be species native to the site.

~~145-141.~~ The HIA states that the proposed action is not compliant with the following policies:

- a) Ensure that any new development within the Memorial's Campbell Precinct does not impinge on the silhouette of the Memorial as perceived from the land axis and that their height is less than the parapet of the Memorial's main building (Policy 1.11.2). The proposed action does not comply with this policy due to the height of the Glazed Link dome and new Anzac Hall roof rising above the parapet of the Main Building.
- b) Conserve, manage and interpret the Anzac Hall as part of the Memorial's Main Building (Policy 1.11). The proposed action does not comply with this policy due to the demolition of Anzac Hall. The impact is proposed to be mitigated to an extent by the photographic archival recording of the existing Anzac Hall and research projects to document the public memories of Anzac Hall and the architectural interpretation of the development of the site. However, policy 1.11.1 of the HMP states that if and when the opportunity arises, the roof of Anzac Hall should be replaced with copper in a radiating pattern. The roof of new Anzac Hall has been designed to include this requirement.

~~146-142.~~ The Department generally agrees with the HIA's assessment of the action in terms of consistency with the HMP policies.

a) s. 42(1)

a)b) The Department considers that the proposed action departs from with the HMP as Anzac Hall will not be conserved and is proposed to be demolished. However, the contribution of Anzac Hall to the values of the site will be conserved via archival recording and documented memories and as such it will continue to be presented and transmitted to future generations in alignment with the Commonwealth Management Principles (Condition 5).

b)c) The Department also considers that the proposed action departs from the HMP as the rooves of both the Glazed Link and Anzac Hall will rise above the parapet of the Main Building and will be visible along the Parliament House vista. While the proponent has reduced the height of these rooves as much as practically possible, the impact cannot be completely mitigated.

~~147-143.~~ Though the proposed action departs from some of the policies set out in the HMP, as explained above, the Department, as explained in this report, is satisfied that if the proposed action is undertaken in accordance with the recommended conditions, then it will not have unacceptable impacts on the Commonwealth and National Heritage values of the AWM. Further, the Department is satisfied that the recommended decision is not inconsistent with the Commonwealth Heritage Management Principles and the National

**S. 42(1)**

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EPBC 2019/8574

Attachment A

Heritage Management Principles. The Department's consideration of the National Heritage Management Principles is outlined in paragraphs x-x. The Department's consideration of the Commonwealth Heritage Management Principles is outlined below.

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5. All Commonwealth-owned National Heritage places must have a heritage management plan. The agency responsible for the site needs to lead the process to make its heritage management plan a statutory document. The AWM has not done this. Therefore, the:
  - a. Minister is not obliged to consider the heritage management plan in making an EPBC Act approval decision, but we will include advice on the heritage management plan in our briefing,
  - b. department cannot enforce compliance with the heritage management plan.

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# s. 22(1)(a)(ii)