



## **Community Consultation - Block 3 Section 39 Campbell (AWM) - Early Works Application**

### **Comments by Lake Burley Griffin Guardians (LBGG)**

**April 2021**

The NCA has presented a proposal for the Australian War Memorial redevelopment works for public comment. The overall works include:

- Construction of a new southern entrance and development of new lower level
- Temporary removal of the Memorial's front façade
- Demolition of the existing Parade Ground/forecourt
- Reconfiguring the Parade Ground/forecourt
- Removal of approximately 114 trees including high quality trees of the southern area of the precinct
- 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 works are to expand the museum display space, provide visitor facilities, improve disability access and increase overall visitor capacity.

- The NCA assesses works approval application with the National Capital Plan, focusing on planning matters and quality of design.
- The NCA has noted that the development has been approved in accordance with the *EPBC Act* by Minister Susan Ley.

Lake Burley Griffin Guardians (LBGG), due to its role in protecting Lake Burley Griffin and its lakeshore landscape is making comments limited to its own organisational objectives.

LBGG notes that the existing Anzac Parade is referred to as such in the Commonwealth Heritage Listings of the place but in the National Heritage Listing, Anzac Parade a major component is referred to as the 'Memorial Parade'.

NCA has not provided information on how the works approval will be assessed against the National Capital Plan (NCP) and how the NCP's planning requirements will be considered.

**The following comments both relate to the overall project and the 'early works' as this latter is an indivisible part of the whole project. In particular, this is most obvious with the proposals to demolish the Anzac Hall and remove trees (114, not including trees already removed), these are major and necessary early steps upon which most of the 'later works' are predicated. Therefore, the 'early works' cannot and should not be separated in a holistic planning and approval sense from what follows – the entire project critically requires assessment as a whole before any**

**works begin. To do otherwise is both inappropriate general planning practice and certainly not best heritage planning.**

## **Comments on Impacts of the proposed works for Block 3 Section 39 Campbell (AWM) - Early Works Application**

### **1. Significant symbolic landscape design integrating the Australian War Memorial and its Landscape Setting**

The commemorative and memorial qualities of the Australian War Memorial (AWM) at the highpoint of the Memorial Parade (Anzac Parade) are most highly valued by the Australian community and have been so since the AWM was constructed in 1936 to comfort a grieving nation.

The AWM is particularly symbolic for that purpose, set within the serene context of the green canopies and beneath the green textured Mount Ainslie. The AWM, with Mount Ainslie, is a unique and dramatic northern terminus of the Land Axis that is the principal vista of Canberra, viewed in both northern and southern directions. The vista to the north has significant commemorative associations along the Memorial Parade. The Memorial Parade (also known as Anzac Parade) is a considerable component of the National Heritage Listing of the 'Australian War Memorial' and Memorial Parade'.

The native vegetation canopy of greenery covering the pyramidal form of Mount Ainslie provides an aesthetically pleasing, symmetrical, vegetated backdrop, extending to the lower slopes, that frames the AWM. This living, green drapery is extended outwards and forwards through the fanning of the planted trees around and in front of the AWM, so that the eye is led to the present domed structure arising from the greenery.

The significant array of trees of that 'fanning' framework are identified as numbers 139-145, 158-164 in the *Preliminary Aboricultural Assessment* (Canopy Group, 2021). The trees on the fans are dominated by *Eucalyptus maidenii* and *E. mannifera* on the western side and *E. mannifera* with smaller *E. pauciflora* on the eastern side. The dominating trees were strategically selected to create the canopy flanks that are lower in height from *E. globulus* ssp *bicostata* of the Memorial Parade but are also a sub-species of *E. globulus*. The *E. maidenii* are perfectly selected to assist in directing the eye to the AWM entrance and significantly from vistas experienced from the Memorial Parade particularly at the Lake.

The existing pathways either side of the current parade ground make a clear link to the outer edge of Memorial Parade physically and visually directing visitors to and from the Memorial Parade. The proposed new pathways make an awkward link to the Memorial Parade.

The proposal damages this clearly planned designed landscape context.

### **2. Significant visual aesthetic and social importance**

The visual aesthetic qualities of the vista to the AWM have been most carefully created to accentuate the visual impact of the AWM emerging from the Mount Ainslie foothills with the strong form of the dome, set against the background of the natural form of the mountain.

The stepped cruciform of the AWM accentuates the domed structure of the AWM with its stone exterior. Most importantly its dome form arising from the landscape setting watched

over by Mount Ainslie, along with the Memorial Parade, has become the symbolic focus of commemoration and memorialisation for Australians. The stunning vista of the AWM is appreciated along the sweep of the northern Land Axis vista from several points but is particularly appreciated on and from the southern side of Lake where the sweep of the axis' linear landscape is offset by the flat-water plane of the Lake, and the scale of the AWM and Memorial Parade is satisfying. It is further accentuated by the red ochre coloured scoria of the Memorial Parade. Lake Burley Griffin lies astride the intersection of the 'land axis' from Parliament House to Mount Ainslie and the 'water axis', that extends from Black Mountain crossing the three central water basins approximately aligned with the water course. The scale of the Australian War Memorial is a human scale but at the other end of the axis, at Parliament House, the AWM is much reduced.

The *Australian War Memorial—Heritage Management Plan—Final Report* (GML report 2011:41) noted:

While no specific community-based research has been undertaken, it is likely that the community would attach high value to the mature plantings on the AWM site. The landscape and setting of the AWM is also likely to be held in high esteem by veterans and other community members.

The NCA's, *Anzac Parade Heritage Management Plan* (Marshall et al 2013:i-ii) recommends:

- Conserve the treescape and overall landscape character of Anzac Parade.
- Protection of views and vistas to and from the Parade.

Many of these trees are mature and significant features. Together they contribute to the AWM cultural landscape as an environmental canopy group.

Apart from their design contribution, mature trees are particularly important for total environmental health, cooling the environment and providing a habitat for wildlife, particularly birds. The trees will also have established a considerable underground mycelium network that is important in tree health.

There is also concern for the impact of the glazed courtyard that we understand will be visible as a shining surface (although said to be reduced in impact by the use of EFTE in the vista of the memorial from Lake Burley Griffin and other points along the Memorial Avenue.

### **3. Detrimental Impacts on the significant symbolic design integrating the Australian War Memorial and its Landscape Setting and on the significant visual aesthetic and social importance**

While there is an ecological impact study with rigid scientific parameters there appears to be no impact study on the designed cultural landscape values of the landscape setting, which is so strongly significant to this place.

The *Heritage Impact Statement* (Hector Abraham Architects, 2020) while strong on the architecture, does not provide an in-depth analysis of the designed landscape's importance which the Guardians believe is a critical component of the AWM, the Memorial Avenue and the nationally significant Land Axis vista. This is not just a flaw of the Abraham report but a serious flaw and omission in the critical requirement of comprehensiveness of the suite of documents provided to the NCA to allow a proper assessment for approval of the project.

The separately provided Arborist's report only comments, as is usual in such reports, on **individual** trees and not groupings of trees, nor, more importantly, on the broader cultural

landscape and setting (including vistas of it), which are constructed in part by trees, so in this regard that report is not sufficient.

There should have been a specialist assessment of the AWM and Memorial Avenue's cultural landscape (the entire memorial precinct) and the development project's impacts on it. This is a very serious omission in the ability of those assessing the project's impacts for this Works Approval.

As noted in 1. and 2. removal of trees on the southern side of the AWM has the following impacts on the place/s:

- Removes the memorial's green drapery and opens the vista to a background of moving traffic on either side of the Memorial.
- Creates large gaps in the green canopy drapery and will be an adverse impact on the heritage aesthetic significance of the major sight line of the Memorial Avenue to the AWM.
- Destroys the carefully conceived aesthetic design of tree planting as a fanned group alongside the existing splayed pathways that extend from the AWM to the outer edge of Memorial Parade, clearly directing people access.
- Destroys mature tree features that have high environmental value and bird habitat value that is greatly appreciated by visitors.
- The proposal to install new tree plantings as straight rows either side of the proposed curved paths is inappropriate. The fanning of the tree groups and the straight splayed pathways provide the visual, physical and species link to the Memorial Parade. The names of the replacement species are not mentioned. There is no reference to trees being pre-grown so that some age and size to the replacement trees is available.
- The perception that trees can be replaced with 'safe' species and similarly-aged trees is flawed as this consistency, whilst a common design objective, is difficult to maintain over the years – nature is not as compliant as soldiers in a military parade. Tree avenues frequently have odd trees damaged by lightning, storms or animal/insect/disease attack, in which case a particular tree will need to be replaced. Tree avenues can still be read as such even though there may be a few anomalous features and these add to the character and value of the avenue if they are not too dominant. It is similar for this existing fanning tree group.
- The glazed courtyard is detrimental to the vistas of the AWM because of its visibility from the Avenue and the Land Axis. (See Abraham Figs 42 and 43). This maybe further exacerbated by the degree to which EFTE reduces reflection.
- The glazed courtyard addition, by virtue of its scale and shape, will also substantially and detrimentally alter the reading of the AWM's important current setting and architectural values as seen from Mt Ainslie looking south down the Land Axis towards Parliament House. The comparatively modest scale AWM Hall, that is deliberately of human scale, will be unbalanced by the industrial size of the new extension complex.
- The new entrance, proposed to better manage disabled access, seems to be designed as a preferred, primary entrance to the current main entrance – stressing the direct access to the museum of objects over the commemorative function – literally, and inappropriately, undermining and downgrading the present and original entrance above.



Image from the AWM Planning Report (Knight Frank 2021) showing the fanning of the trees at the southern entrance and the way the existing pathways link to the Memorial Parade

## Comments on Process

### 1 NCA Requirements

The heritage listed place under consideration is listed in heritage listings as follows:

- The Australian War Memorial and Memorial Parade (Anzac Parade) listed in the National Heritage List.
- Parliament House Vista listed In the Commonwealth Heritage List
- The Australian War Memorial listed in the Commonwealth Heritage List
- Anzac Parade listed in the Commonwealth Heritage List.

The NCA is required to focus, inter alia, on planning matters and quality of design in relation to the role of Canberra as the National Capital as set out in the National Capital Plan. However, Items 2.4 Liveability (2.4.1-4) of the NCP are not considered in the Abraham heritage impact assessment for the AWM redevelopment. These are NCP obligations separate to those already assessed under the *EPBC Act* by Minister Ley and even if there be some overlap these obligations need to be re-considered by the NCA to ensure their legal obligations have been met, particularly, as the Minister is able to take into account external matters in her consideration other than, say, just heritage values.

This is a critical omission in the heritage impact assessment so is addressed below.

Item 2.4.2 b The development will **not** compliment and enrich its surroundings for reasons identified above, including the Memorial Parade, vistas, the cultural landscape of the AWM and the current values of the AWM complex.

Item 2.4.2 c As noted above, the proposal does **not** contribute positively to the overall composition, symbolism and dignity of the National Capital by its reduction in the current heritage values of the AWM, particularly its symbolism, its distortion of the AWM's purpose over-emphasising the technology of war, establishing a new entrance to encourage visitors to bypass the commemorative and memorial spaces, by its disregard for the AWM's cultural landscape, particularly by removing numerous established trees, negatively impacting vistas, and its demolition of the highly valued, current, Anzac Hall.

Item 2.4.2 e It does **not** reinforce and complement the Main Avenues, it devalues Anzac Parade which is a Main Avenue as well as being heritage listed in its own right.

Item 2.4.2 h Vistas to major landscape features are **not** protected and enhanced by the development (see above).

Item 2.4.2 j Opportunities are **not** encouraged for enhancement and reinforcement of the physical, symbolic and visual linkages to adjoining areas of the Inner Hills and the Central Area but are devalued by the proposal (see above).

Item 2.4.4 c The proposed development is **not** consistent with both the relevant HMP's – for the AWM and Anzac Parade (see above).

Item 2.4.4 d The use and presentation of heritage places is **not** consistent with heritage values (see above).

Item 2.4.4 e The proposed development, within the Designated Area is **not** consistent with the Burra Charter as required.

The proposal and the process of determining appropriate works are grossly inconsistent with the following Burra Charter Articles:

- 2 Conservation and Management
- 3 Cautious Approach
- 5 Values
- 6 Burra Charter Process
- 7 Use
- 8 Setting
- 9 Location
- 11 Relate Places and Objects
- 12 Participation
- 13 Coexistence of Cultural Values
- 14 Conservation Process
- 15 Change
- 17 Preservation
- 21 Adaptation
- 22 New Work
- 24 Retaining Associations and Meaning
- 26 Applying the Burra Charter process, and
- 27 Managing Change.

## **2 Damage to the Memorial Parade Vista**

The emotional and visual aesthetic value of the heritage listed place, the Memorial Parade, has been disregarded in the heritage impact assessments.

As stated in Item 2 the NCA is not following the recommendations of its own Management Plan for Anzac Parade (referred to as Memorial Parade in the National Heritage Listing)

There is no heritage impact study on the proposed development on the Memorial (Anzac) Parade. The Memorial Parade is one of the most important linear route landscapes in Australia with the AWM and Mount Ainslie as its terminus.

The removal of trees at the southern entrance has been treated extremely casually by the proposal considering they are the fabric of the memorial precinct and have been developing for the last 50 years. To simply state, without further detail and justification, that the trees will be replaced in a different configuration and as a safe species, potentially, significantly compromises the careful approach required for the vulnerable cultural landscape of the memorial precinct.

The proposed removal of the trees and their proposed replacement is seriously flawed. The role of the fanning canopy with existing paths will be negated in the Memorial Parade vista due to the proposed replacement trees now being shade avenues for the proposed public pathways. There is no explanation why these new routes, that involve destruction of significant trees forming the green drapery around the AWM, were selected or what options to exclude the trees from removal were considered.

## **3 Ground-swell of community concern against the development**

LBGG supports the report made by the Hon David Kemp AC, on behalf of the Australian Heritage Council in their preliminary submission of 31 July 2021 which details the many inadequacies and threats to the listed heritage values posed by the proposed development.

LBGG also supports the strong statement against the proposed development made by reputable organisations and 80 eminent individual Australian history and other relevant scholars in their letter to Prime Minister, the Hon Scott Morrison MP, on 22 October 2020.

LBGG is aware of a number of media articles in *the Canberra Times*, *the City News*, *ABC News*, several articles in *the Guardian*, and others. These articles reflect community concern against the AWM development.

## **Conclusion**

There has been no, thorough, impact study on the designed landscape of 'the AWM and Memorial Parade as a national heritage precinct and the role of the landscape setting'. This is a significant omission as the iconic AWM will undoubtedly and unfortunately be considerably damaged to satisfy a mis-guided vision of the AWM's purpose.

The aesthetics of the commemorative and memorial vista have so far been ignored in this depauperate project planning and proposal.

The project should be assessed, in-keeping with best planning, including heritage planning, practice not just any 'early works' – the overall project is indivisible from its inherent dependencies.

Importantly, the proposed development is inconsistent with the NCP (2.4), the NCA's own statutory guiding document, in many respects and so should be delayed until substantially re-designed or abandoned, as it is difficult to consider with such NCP conflicts how the project could be approved by the NCA without further assessment of the relevant cultural landscape impacts and significant changes to the project design.

It is hoped that the NCA's consideration of the WA for this patently flawed project, and highlighted already in numerous community and expert comments, will lead to some significant changes to the project, affirming the community's faith in the NCA's independence and integrity of its decision-making in protecting this icon and its context, the nationally important heart of Canberra.

**Richard Morrison and Juliet Ramsay**

Lake Burley Griffin Guardians

20 April 2021