Australian Government
Australian Heritage Council

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To whom it may concern

Australian War Memorial Expansion – Preliminary Documentation Submission

I write on behalf of the Australian Heritage Council (AHC) regarding the proposed developments at the Australian War Memorial, and congratulate the Project Team for the effort that has gone into the production of the report.

While I note there are commendable reasons for the project to proceed as documented in terms of meeting the functions of the Memorial, our responsibility is to respond to the impacts on the National and Commonwealth heritage values of the site. The comments of the AHC are as follows:

1. Overall the Council notes that the entire project is predicated on the assumption that the Memorial will not be able to perform its functions unless the size of the exhibition and other areas is considerably increased. The intent of the project to acknowledge and incorporate continuing arenas of conflict and military operation is commendable.

   The documentation provided, however, while addressing alternatives relating to structural expansion, appears to have not addressed options such as operational and other functional changes that could minimise the need for additional space. These include different and technological methods of interpretation and museum display, as well as opportunities to introduce a more sustainable visitation strategy. Both are important aspects of a comprehensive heritage management programme and should be considered as key approaches to improving capacity.

   Physical expansion to support the display of large objects such as submarines and aircraft is not a sustainable intent over the long term and, in the current circumstances, cannot be achieved without significantly impacting listed heritage values.

2. The listed heritage values of the Memorial include its landscape and setting, and this is discussed in some detail in the documentation. While the discussion is clear on matters such as impacts on the Anzac Parade context, view lines, or the impacts on trees in the precinct, it is noted that the impacts on the landscape and micro-setting of the Memorial have not been specifically considered in terms of the accretion of proposed structural change within the Memorial site.

   There is ambiguity in the response in Section 6 of the Heritage Impact Assessment (HIA) (p. 240) to the query 'Has the advice of a consultant skilled in the conservation of

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heritage landscapes been sought? If so, have their recommendations been implemented?'. In its assessment, the document omits consideration of the impact on the heritage landscape of the expansion of the C.E.W. Bean Building (included as a Variation to the original referral). While the assessment concludes that the larger structure has a positive impact in providing increased space, as noted in point 1 above, it does not consider the negative impact of the expanded footprint on the heritage landscape and setting through the reduction of 'natural' space. This action imposes a considerable impact on and imbalance of landscape design within the site, and can be seen to compromise the relationship between the natural bushland setting of the Memorial and its continuity with Mount Ainslie.

While we note there is a reference to these concerns in the HIA (page 57) that 'care must be taken to ensure the landscape qualities of the eastern precinct are not overly diminished', this fails to acknowledge that the proposed expansion already has this effect.

3. While the documentation, and particularly the HIA, provide a detailed response to individual actions, the combined impacts of the works is less well considered. It is the holistic impact of the proposed changes that is of concern in terms of the listed heritage values, including the landscape and setting. A comparison of Figures 2.1 and 5.1b (pages 8 and 33 of the Submission) highlights the complexity and extent of the combined actions and the alterations to the heritage landscape (which includes all aspects of the Memorial structure). This comparison clearly shows the loss of natural areas to designed and constructed spaces and the full extent and design changes arising from the redevelopment of the Parade Ground area.

4. In addition the Council notes the following individual actions as having negative impacts on Listed Heritage Values that should be seriously reconsidered:
   - The demolition of the existing Anzac Hall (identified in the HIA has having a substantial negative impact)
   - The redesign and expansion of the Parade Ground
   - The inclusion of the Oculus - principally in terms of the removal of a direct line of access into the AWM building
   - The inclusion of an external lift
   - The expansion of the C.E.W. Bean building.

Regrettably the Council cannot support the conclusion that the proposed redevelopment will not have a serious impact on the listed heritage values of the site and recommends that the matters above be given serious attention.

Yours sincerely

The Hon Dr David Kemp AC
Chair
31 July 2020