

## **Comment on the Australian War Memorial development 'conditions of approval' imposed by the Minister and the report of the DAWE Historic Heritage Section obtained under FOI.**

### DAWE Historic Heritage Section (HHS) Report

It is important to differentiate between the original HHS Referral Report in Dec 2019 which in the FOI doc is 'Document 2', pages 4 to 29; and the final HHS report associated with the final scheme submitted for approval which is 'Document 1', pages 1 to 3.

It's worth noting the impacts on the Referral stage as it shows that right at the start the experts in DAWE were flagging significant impacts – but little changed. However, though little has changed and the impacts are still relevant, as 'Document 2' is an assessment of impacts at the referral stage it should not be used directly to talk to the impacts of the approved scheme - only those impacts on pages 1-3 'Document 1' should be referred to directly.

### HHS Advice 21 September 2020

This is pp1-3 of the FOI document.

There are **six** heritage impacts noted (one of which is an overall impact)

- **Three** of these heritage impacts are high intensity - (one of which (the overall) is large scale and two are permanent impacts (demolition of Anzac Hall and overall impacts) and one a semi-permanent impact (the glazed link)
- **Two** of these heritage impacts are permanent moderate impacts (southern entry lift and oculus)
- **One** of these heritage impacts is permanent low to moderate intensity - the new Anzac Hall

The overall impact noted on p2-3 is the impact on the heritage values of the AWM that reduce the relative scale of the ceremonial (read also commemorative) spaces in the landscape. This is very important in relation to the Condition of consent No17 that monitors future further reduction in commemorative areas when actually 'the horse has (will have) already bolted' as this HHS assessment notes that all the new exhibition spaces have skewed the balance against commemoration and hence the impact.

### The Heritage Impacts vs Conditions of Approval

Conditions of approval such as archival recording - or (and this is ludicrous) training the staff to talk about the meaning of the form of the Memorial now wrapped in the glazed addition - do not reduce or change the actual impact - that impact remains - that is why it is called an impact.

**The key point is that NONE of the conditions reduce the heritage impacts identified by the Historic Heritage Section.**

The impacts identified by the HHS are:

- Loss of Anzac Hall - no archival recording etc changes this impact
- The increased size of the new Anzac Hall and impact on overall ceremonial landscape - nothing can change this impact

- The Glazed Link impact on an ability to interpret the relative isolation of the Memorial building
- The glazed lift visibility in the immediate setting of the AWM (but not so much the PH Vista)
- The impact of the oculus on the monumental character of the memorial building by adding a new distracting element
- The overall impact on the AWM from the comparative loss of the ceremonial spaces in the landscape (from greatly increased museum exhibition spaces)

### The Types of Conditions

There are 29 conditions - 11 of these or more than a third (38%) are standard Administrative conditions probably applied to all EPBC Act approvals

Of the remaining 18

- Two are aimed at stopping future impacts not yet identified during construction
- Seven are typical requirement to do more Heritage Impact Assessment work or specialist advisor work such as structural engineer during the façade works once again to stop future impacts during construction - a somewhat bizarre one is that the design needs to be finalised before construction (No14)!
- Two regard archival photo recording or reuse of demolished AH material - actually that is really procedural in line with Government Waste Action Plan 2019
- Six imply that they are tighter requirements or conditions but are actually just those included in the final scheme such as No18 minor reduction in the size of the parade ground area and some seating that was Fig 3 in the Final application docs report
- One, the odd one noted above that looks tough in relation to more reports and Ministerial approval for any further loss in Commemorative areas but actually 'the horse has already bolted', as noted in the HHS report on overall impacts.

### Summary comment

The recognised heritage impacts will NOT be resolved or reduced by the conditions of approval imposed by Minister Ley.

The heritage impact assessment provided by the Historic Section of DAWE on 21 September 2020 on the final submitted AWM scheme, and obtained via an FOI application, identified six significant heritage impacts (five of the six permanent impacts and one semi-permanent), three of the six as high intensity heritage impacts and **the overall impact as being high intensity large scale and permanent.**

**None of these heritage impacts will be removed or substantially reduced by the conditions of approval imposed by the Minister.** Of the 29 conditions over a third are administrative conditions that typically relate to EPBC Act approvals, and the majority of the others are either aimed at stopping further impacts during construction or actually define (minor) amendments that were included in the final proposed scheme but are not actually additional restrictions or limits.