
ATTACHMENT C

Response to Public Submissions

AUSTRALIAN WAR MEMORIAL DEVELOPMENT PROJECT

RESPONSE TO PUBLIC SUBMISSIONS



SEPTEMBER 2020

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1 EXECUTIVE SUMMARY

This Response to Public Submissions (**RtPS**) report provides an overview of the public comments made in response to the Australian War Memorial (the **Memorial**) Development Project (the **Project**) (formerly known as the Redevelopment Project) Preliminary Documentation (**PD**) placed on exhibition from 3–31 July 2020. This report becomes Attachment C to the Final Preliminary Documentation (**FPD**) submitted in September 2020.

This report includes an analysis of comments to demonstrate key areas of interest, support and concern in relation to the heritage aspects of the project, and the Memorial's response to the issues raised. The amendments to the Preliminary Documentation that inform the Final Preliminary Documentation provided to the Department of Agriculture, Water and the Environment (**DAWE**) for consideration are included.

1.1 Structure of this Report

The RtPS report structure is aligned to that of the Preliminary Documentation made available for public comment in order to allow simplified assessment of the Memorial's responses and subsequent document changes to comments against that documentation.

- Section 1 – Executive Summary
Provides an outline of the RtPS report
- Section 2 – Introduction
Provides a basic introduction to the Australian War Memorial and the Development Project.
- Section 3 – Overview of Exhibited Project
Provides a summary overview of the Project as exhibited through the July 2020 Preliminary Documentation.
- Section 4 – Key Environmental and Heritage Issues for Consideration
Provides a summary overview of key environmental and heritage issues described in the July 2020 Preliminary Documentation.
- Section 5 – Analysis of Submissions
Provides a high level analysis of the key themes raised in submissions and provides a statistical review of the submissions by stakeholder group. A key theme matrix by individual submission is provided as Appendix A to this RtPS.
- Section 6 – Actions taken during and after Preliminary Documentation exhibition
Describes further consultation or design development undertaken during, or in response to the exhibition of the July 2020 Preliminary Documentation.
- Section 7 – Changes to the Preliminary Documentation
Summarises the changes made to the July 2020 Preliminary Documentation in response to the submissions received, design development and additional information submitted with this report.
- Section 8 – Updated project description
An updated overview of the Project following changes made in response to the submissions received, design development and additional information submitted with this report. The updated report becomes the September 2020 Final Preliminary Documentation.

- Section 9 – Response to Submissions
Details the key issues raised in community submissions to the July 2020 Preliminary Documentation and the Memorial’s responses to these issues. A complete list of commitments made by the Memorial in response to the submissions is provided as Appendix B to this RtPS report.
- Section 10 - Conclusion
A summary of this RtPS report.
- Section 11 – Appendices
Appendices referred to in this RtPS report.

1.2 Public Comment Process

The Project was the subject of public exhibition by the Memorial at the direction of DAWE in accordance with section 95A of the *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)*. Exhibition commenced on 3 July and closed on 31 July 2020. Copies of the July 2020 Preliminary Documentation relating to the proposal were made available at the following locations:

- ACT Planning and Land Authority, Ground Floor South, Dame Pattie Menzies House, 16 Challis Street, Dickson ACT
- ACT Libraries, Civic Library, Civic Square, London Circuit, Canberra City
- Department of Agriculture, Water and the Environment, John Gorton Building, King Edward Terrace, Parkes ACT
- Online at the Australian War Memorial Development Project website:
<https://www.awm.gov.au/ourcontinuingstory>
- Australian War Memorial reception, Administration Building, Treloar Crescent, Campbell.

Comment was able to be made electronically to a dedicated email address (development@awm.gov.au) or by mail to the Memorial.

All submissions received a response from the Memorial acknowledging receipt of public comment and confirming that their comments would be considered in this report and provided to the DAWE for its consideration.

Each submission was assigned a sequential number based on the date/time of receipt and is identified as such throughout this document by that number. Disclosed comments have had their sequential number overlaid on the top right hand corner of the first page in order for them to be linked back this report clearly.

On 8 September 2020 the Memorial wrote to all respondents to seek their permission to make their comment public. This included offering varying levels of privacy from simple redaction of contact details only to protected disclosure with name and any identifying details removed.

Where permission has been granted the Memorial will publish public comment on its website alongside this report.

Note that this applies only to public disclosure; all comments have been provided in full to DAWE.

2 INTRODUCTION

Officially opened in 1941, the Australian War Memorial is an iconic building of national significance. Located in the sight line of Australian Parliament House, the Memorial reminds the nation of the cost of war and the effects of service.

Our values, our character and our identity live on in the stories of past and present, and future service members, their families and community. More than one million people visit the Memorial every year to honour this service and learn about their experiences in war, peacekeeping, and humanitarian operations.

On 1 November 2018 the government, with bipartisan support, announced the funding of the Memorial's Development Project. This project will modernise and expand the galleries and buildings to enable the Memorial to tell the continuing story of Australia's contemporary contribution to a better world through the eyes of those who have served in modern conflicts; connecting the spirit of our past, present, and future for generations to come.

The project includes a New Southern Entrance, refurbishment of the Main Building, a new Anzac Hall sensitively connected to the Main Building by a glazed link, an extension to the CEW Bean Building (Bean Building), Research Centre, and public realm works.

The project was assessed as a controlled action under the Environment Protection and Biodiversity Conservation Act 1999.

In June 2020, the Memorial submitted its Preliminary Documentation as part of the *EPBC Act* assessment process. This documentation was made available for public comment from 3–31 July 2020. This report outlines the Memorial's response to these public submissions.

2.1 Description of the place and key parts of the place

The Memorial is located on Block 3, Section 39, in the Australian Capital Territory (ACT) suburb of Campbell. It is located within an iconic site in the Canberra landscape at the foot of Mount Ainslie on an area of approximately 14 hectares. The Memorial's vista and location are nationally recognisable.

The site includes the buildings, together with landscaped grounds surrounding the buildings incorporating ceremonial monuments and sculptures, memorials, large technology objects, plaques, the parade ground and commemorative plantings.

The Memorial incorporates four distinct precincts:

- Main Memorial Building, including Anzac Hall;
- Parade Ground;
- Western Precinct including the Sculpture Garden and Administration Building; and
- Eastern Precinct including the Bean Building, Cafe and Terrace.

The following description is taken from the Memorial's *Heritage Management Plan 2011*:

"War memorials are ubiquitous expressions of Australian nationhood. They appear amongst every concentration of people across the country, from our cities to our tiny outback towns. But the grandest of these expressions, the monument that strives to honour all forms of remembrance and all events that need

to be remembered, is the Australian War Memorial in Canberra. Its physical presence alone is a dominant feature of the nation's capital: an Art Deco edifice at the head of Anzac Parade facing the federal houses of parliament across Lake Burley Griffin.

A shrine, a museum, an archive, a formal landscape and an outstanding collection of buildings, the Australian War Memorial offers itself to the nation as a place for reflection, research, education and ceremony. It embodies many heritage values which are recognised by its listing on the Commonwealth Heritage List, the Register of the National Estate, the ACT Royal Australian Institute of Architects' National Heritage List and Register of Significant Twentieth Century Architecture, the ACT National Trust Register and, as part of the broader Anzac Parade listing, the National Heritage List".

3 OVERVIEW OF THE EXHIBITED PROJECT

The below description of the project was exhibited for consideration through the July 2020 Preliminary Documentation.

The Project will deliver the following outcomes as defined in the Project's Functional Design Brief developed for the Project and demonstrated in the Reference Design:

- a. total new space in the Anzac Hall and Glazed Link of 13,528 square metres consisting of:
 - i. lower gallery area of 2,983 square metres;
 - ii. main level gallery area of 3,460 square metres;
 - iii. mezzanine gallery and viewing area of 493 square metres;
 - iv. Glazed Link public space of 2,153 square metres; and
 - v. respite areas, amenities, circulation, back of house support and plant across all levels of 4,439 square metres.
- b. total new space for the New Southern Entrance consisting of public entrance and cloak, bookshop, theatre and function room, flexible gallery and plant of 3,450 square metres;
- c. total new space for the Bean Building Extension and Research Centre, archive and collection support functions of 7,299 square metres;
- d. total refurbished space in the existing Bean Building of 2,944 square metres; (Note: Approval for the internal refurbishment works is not included in this submission);
- e. the Main Building refurbishment of galleries, educational functions and enhanced circulation is subject to a later heritage process that is likely to commence in 2024 with refurbishment works to commence in mid-2024. (Note: Approval for the internal refurbishment works is not included in this submission);
- f. an extension to the underground car park in the eastern precinct under Poppy's Café to provide an additional 123 permanent car parks (this was varied from the Detailed Business Case solution to reduce the impact of an above ground car park on Remembrance Park); and
- g. improvements to the Public Realm with a focus on providing safe and pedestrian paths from the car parking and bus parking through to the Memorial visitor and education program entrances that are compliant with the *Disability Discrimination Act 2000*.

3.1 Key Design Elements

3.1.1 New Southern Entrance

The proposed New Southern Entrance is located below the existing forecourt, and will improve the visitor arrival experience, support enhanced visit planning and orientation, and provide universal access. The existing forecourt, stairs and entrance will remain as a primary entrance for visitors and dignitaries as it is now. The new entrance will enhance visitor orientation by improving security screening capability and providing added visitor functions including a 250-person theatre, function room and public amenities. The New Southern Entrance will be accessed from both the east and west, have direct path access from the western surface car park, and be immediately connected to the underground car park to the east via the courtyard.

Visitors will enter the lower level of the Main Building through a set of two central stairs and two flanking lifts. Two new stairwells will be constructed either side of the top of these stairs in the lower level of the Main Building. The intent of the stairwells is to circulate visitors directly to the Pool of Reflection and Roll of Honour to maintain the connection to the Commemorative Area.

3.1.2 *Anzac Hall and Glazed Link*

The new two-level Anzac Hall will be a purpose-built facility to house and display exhibitions, including large technology objects. Anzac Hall is to be constructed in the location of the existing Anzac Hall and will approximately double the area of the purpose-built gallery. The new Glazed Link is proposed to make use of the high-value space between the rear of the Main Building and Anzac Hall. A key feature of this space is to provide a major breakout space at the mid-point of the exhibition journey of the visitor. The Memorial has no such space at present.

The Glazed Link will strengthen and improve connectivity between the Main Building and Anzac Hall, thereby improving the visitor experience and enhancing circulation. This proposal for Anzac Hall and Glazed Link will provide the majority of the additional gallery space for the benefit of all visitors and the appropriate recognition of veterans.

3.1.3 *Bean Building Extension and Research Centre*

The Bean Building extension and Research Centre will enable operational and non-critical administration functions to be relocated out of the Main Building. The extension will enable the relocation of the National Collection Branch to an area closer to the archives and loading dock, and will directly connect to the Research Centre. This will significantly improve the function of the National Collection Branch. The Research Centre will relocate from the northern end of the Main Building into a new area adjacent to the Poppy's Café to the east. It will integrate with the Bean Building to provide efficient and secure access to the National Collection, and create a light filled area more attractive to the public, which will promote the Memorial's research function.

3.1.4 *Main Building Refurbishment*

The Main Building works will address existing compliance limitations, refurbish existing modern conflict galleries, strengthen the existing structure and convert some areas that are used for support functions such as staff facilities, storage racks and the security control room into gallery spaces. The areas most important to convert to galleries are primarily near the main circulation spine, closest to the Memorial's heart and underneath the Hall of Memory. The works will address the areas of non-compliance in the existing buildings such as egress, accessibility, work health and safety, and improved lift access. This will also improve direct connectivity through the Main Building to the Glazed Link and Anzac Hall.

3.1.5 *Galleries*

The galleries work will be a combination of new and upgraded galleries, with the majority of new galleries to be in Anzac Hall. As described throughout this document the focus of the additional galleries will be on recent conflicts. The number of galleries that are to be refreshed in the Main Building will be limited to areas on the lower floor.

The scope of the project does not include the Commemorative Area which includes the Pool of Reflection and Roll of Honour; the Hall of Memory; or the First World War and Second World War galleries. The priorities for the gallery development are:

- a. Afghanistan;
- b. Iraq and Northern Syria;
- c. East Timor;
- d. Peacekeeping Operations; and
- e. Humanitarian Operations.

3.1.6 *Public Realm*

The Public Realm works include a range of works to improve the visitor experience through better pedestrian accessibility and connectivity from the time of arrival through to the Memorial buildings and landscape destinations. The Public Realm includes hard and soft landscape, precinct security, external seating, and small shade structures. It does not include any significant vertical structures.

4 KEY ENVIRONMENTAL AND HERITAGE ISSUES FOR CONSIDERATION

The following were listed in the exhibited documentation as key environmental and heritage issues for consideration through the July 2020 Preliminary Documentation.

The Memorial as a Commonwealth agency is required by Sections 15B and 15C of the *EPBC Act* to ensure that the potential impact of the proposed development on the National Heritage values is addressed.

The Memorial is further required under Section 28 of the *EPBC Act* to address all environmental concerns associated with the Commonwealth land. This includes impact on heritage both generally and as specifically identified in the Commonwealth Heritage Values, as well as impact on other aspects of the environment such as plants, soil, animals, and the landscape.

In terms of heritage, the proposal must be assessed against both National and Commonwealth Heritage Values. As the Memorial also forms part of the Parliament House Vista Commonwealth Heritage Listing, the proposal has also been assessed against these values.

4.1 Heritage

The Project includes very extensive alterations and additions to the Bean Building, alterations to the southern entrance and forecourt, the demolition of Anzac Hall, and the erection of a new Anzac Hall with a glazed link between it and the Main Building.

The following summary of heritage impacts is drawn from the Heritage Impact Statement conducted against the proposed plans by Hector Abrahams Architects in May 2020:

- Overall the proposed works make very little change to the external presentation of the main building in the landscape of the Memorial, Anzac Parade, within the Parliamentary Vista. Generally, in view of the whole quantum of work, the changes that are proposed are low impact or positive impact.
- The proposed works include the demolition of Anzac Hall which embodies part of the aesthetic values of the place; this is a significant negative impact and the most detrimental aspect of the proposal.
- The proposed enlargement of the Bean Building and Research Centre is of positive impact on the value of the building as a home for the collection, and as the National Museum and memorial and frees up space within the northern side of the main building for extension of exhibitions.
- The proposed new entrance facilities serve and therefore augment the social value of the building to the Australian community.
- The proposed visitor reception area to the south and Anzac Hall and the glazed link to the north are designed in such a way as to be highly integral to the joint commemorative and exhibition purposes of the Memorial.

4.2 Indigenous Heritage

Though not addressed by the National and Commonwealth Heritage Values, the Memorial site has significance for Indigenous people who have served in Australia's armed forces.

There is one known Indigenous artefact on the grounds of the Memorial. It is located a considerable distance from the proposed project site and will not be disturbed by project works. The Memorial has consulted with representatives of the local Indigenous communities regarding these heritage matters.

4.3 Impact on plants

There are a number of changes to the tree layout on the site, however the overall number of trees will increase and the basic landscape layout of the Memorial (whereby the western gardens are formal, and the eastern precinct connects with Mount Ainslie through eucalypt over grassland) will remain in place. There will be a minimal change to the arrangement for the trees. Importantly where previously planted trees are removed they will be replaced with species endemic to the area.

4.4 Other impacts

There were no other project impacts identified under Section 28 of the *EPBC Act*.

4.5 Additional Environmental Impacts as directed by DAWE

At the direction of DAWE, the Memorial has comprehensively covered a range of other possible environmental impacts in its Final Preliminary Documentation. A summary of these impacts is provided below:

- There are no listed threatened species or communities and/or known habitat for these species or communities, listed migratory species and/or known habitat for these species or areas of remnant native vegetation on the Memorial site. The risk of potential contamination at the site is generally considered to be low.
- The only impact relating to the land as required by Section 28 of the *EPBC Act* is the changes to the layout of the trees on the site, to fit with the changes on the building layout already described above.
- Full details are available in Section 6 of the Final Preliminary Documentation Submission.

5 ANALYSIS OF SUBMISSIONS

5.1 Number of Submissions

A total of 167 submissions were received during the July 2020 Preliminary Documentation public comment period.

Of these, 14 comments were provided by written correspondence, the remaining submissions were provided electronically.

5.2 Submission Stakeholder Groups

Submissions were categorised into one of seven stakeholder groups, as provided in [Table 5.1](#) below. Assessment as to which group a submission belonged to was made based on the information disclosed in the submission.

The Memorial notes that some submitters fell into more than one stakeholder group. Where this occurred, the Memorial categorised submissions based on heritage linked special associations to the Memorial in the following order:

- Veterans Community;
- Contemporary Defence Family;
- Descendants Community;
- Architectural/Heritage Community;
- Community Interest Groups;
- Government; and
- General Public.

The Memorial notes that this methodology was only used in assessing stakeholder group categorisation, and all submissions have been given equal weight in all other respects.

STAKEHOLDER GROUP	DESCRIPTION
Architectural/Heritage Community	Submissions made by architects, architectural bodies, heritage or conservation practitioners or bodies.
Community Interest Groups	Submissions made by community interest groups (or members thereof) representing either a formal membership or a shared interest in advancing a specific point of view or outcome presented by the group. Note this group excludes veterans' organisations which are categorised as part of the veteran community.
Contemporary Defence Family	Submissions made by persons who identified as having an immediate family member (father, mother, sibling, child) who is currently serving or served in contemporary conflicts or peacekeeping.
Descendants Community	Submissions made by persons who identified as having a family member(s) who had served in the Australian armed forces prior to 1975 (i.e. First and Second World Wars, Korea, Vietnam etc.).
General Public	Submissions made by persons who did not identify as one of the other stakeholder groups. The Memorial acknowledges some of the submissions likely fall into other groups,

	particularly the descendant community, but unless this was disclosed they have been grouped as general public.
Government	Submissions made by government agencies, departments or persons representing same.
Veterans Community	Submissions made by current or former members of the Australian Defence Force or Australian Federal Police where the latter identified as having undertaken peacekeeping deployment(s) or community interest groups with strong links to veterans.

Table 5.1: Submission Stakeholder Groups

5.3 Key Themes

Submissions were analysed against the key themes presented in the July Preliminary Documentation Sections 3 – 8 inclusive. Additional key themes as provided in [Table 5.2](#) below were added to describe items not covered by the Preliminary Documentation that submissions addressed.

KEY THEME	DESCRIPTION
PD Section 3 – Need for the project	Comments relating to the need for the project as outlined in the PD. This was further broken down into four sub-themes.
PD Section 4 – Design Development and Selection	Comments relating to design and development of the project as outlined in the PD. This was further broken down into three sub-themes.
PD Section 5 – Description of the project	Comments relating to description of the project as outlined in the PD. This was further broken down into two sub-themes.
PD Section 6 – Assessment against the <i>EPBC Act 1999</i>	Comments relating to the assessment of the project against the <i>EPBC Act 1999</i> as outlined in the PD. This was further broken down into four sub-themes.
PD Section 7 – Identification of impacts on [heritage] Values	Comments relating to heritage impacts of the project as outlined in the PD. This was further broken down into nine sub-themes.
PD Section 8 – Heritage and Environment Mitigation Measures	Comments relating to heritage mitigation measures for the project as outlined in the PD. This was further broken down into one sub-theme.
NEW – Future Gallery Content	Comments relating to curatorial and gallery content and approaches for the gallery spaces described in the PD. This was further broken down into three sub-themes.
NEW – Due Process	Comments relating to matters of due process associated with the proposal. This was further broken down into five sub-themes.
NEW – Non-EPBC Matters	Comments relating to matters outside the <i>EPBC Act</i> . This was further broken down into four sub-themes.

Table 5.2: Key Themes

5.3.1 Submissions by Key Theme

[Chart 5.1](#) below shows the percentage of submissions in which a key theme was raised; noting that many submissions raised more than one key theme.

Comments were largely concentrated on heritage impacts, need for the project and future gallery content.

A large number of submissions also commented on non-EPBC matters, these comments primarily related to the cost of the project and alternative ways in which the funding allocated for this purpose could be used.

A small number of submissions raised more technical or detailed matters under the other key themes.

12 submissions expressed only a general sentiment with no key theme discernible.

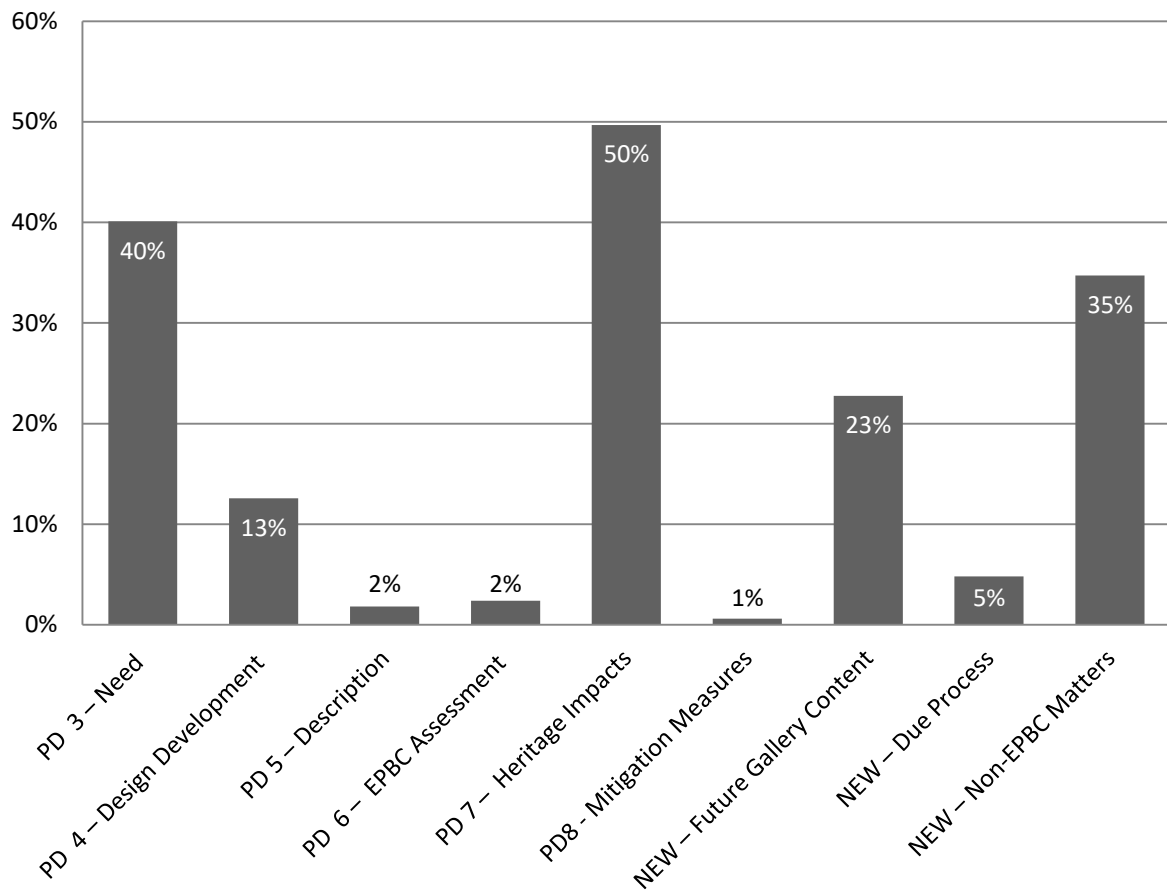


Chart 5.1: Percentage of frequency of Key Themes in Submissions

5.3.2 Key Theme by Group

Table 5.3 below shows the frequency with which a key theme was commented on by each stakeholder group. This data has been used to assess the relative importance of various aspects of the project to each group as described through the Preliminary Documentation.

	NEED	DESIGN DEVELOPMENT	DESCRIPTION	EPBC ASSESSMENT	HERITAGE IMPACTS	MITIGATIONS	GALLERY CONTENT	DUE PROCESS	NON-EPBC
ARCH/HER	40%	40%	20%	30%	70%	0%	10%	30%	20%
CIG	33%	50%	0%	0%	50%	17%	33%	50%	33%
CDF	50%	0%	0%	0%	100%	0%	0%	0%	0%
DESCENDANTS	32%	0%	0%	0%	53%	0%	32%	0%	58%
GENERAL PUBLIC	28%	13%	1%	1%	47%	0%	25%	0%	48%
GOVERNMENT	0%	0%	0%	0%	50%	0%	0%	0%	0%
VETERANS COMMUNITY	67%	5%	0%	0%	47%	0%	19%	5%	5%

Table 5.3: Key Theme frequency by Group

In analysing the data in [Table 5.3](#) it becomes clear that:

- The Architectural/Heritage Community (ARCH / HER) is largely concerned directly with heritage outcomes but also with the design development process and the need for the project;
- Community Interest Groups (CIG) are most interested in heritage, process and design matters;
- Contemporary Defence Families (CDF) were a small group, largely concerned with the need for the project and heritage outcomes;
- The Descendants Community commented most frequently on non-EPBC related matters, typically the cost of the project, but also spoke to heritage outcomes, future gallery content and the project need;
- The General Public, as might be expected, commented the most widely of all the groups. Non-EPBC matters, project cost, and heritage matters were their most frequently raised issues;
- Government comments were limited and focused on heritage matters; and
- Veterans Community members are first and foremost concerned with highlighting the need for the project and after that with heritage matters.

5.4 Key Theme Breakdown

As noted in Section 5.3 above, within each key theme there were one or more sub-themes. These have been analysed based on the frequency with which a sub-theme was commented upon to assess the relative importance of various aspects of each key theme.

A brief summary of the major issues raised and the Memorial's response is provided for each key theme in sections 5.4.1 – 5.4.9 below.

5.4.1 *Need for the Project*

A total of 67 submissions commented on issues relating to the Need for the Project.

A key sub-theme within Need for the Project, with 90% of comments in this category addressing it was the need to better recognise contemporary servicemen and women, and their contribution to the country at the Memorial. Refer to [Table 5.4](#) below for the public comment key themes addressed under Need for the Project.

SUB-THEME	DESCRIPTION	FREQUENCY WITHIN KEY THEME
Lack of capacity to appropriately recognise all conflicts/operations	Comments relating to the need for the Memorial to better recognise contemporary conflicts, peacekeeping and humanitarian operations through additional galleries and exhibitions.	90%
Lack of capacity to explain diverse context of war	Comments relating to the need for the Memorial to better explain the diverse context of war, including how and why we go to war, how we try to avoid war and the impacts on soldiers, civilians and nations of the wars or peacekeeping operations we have been involved in.	22%
Lack of circulation space	Comments relating to the need for the Memorial to improve the allocation and use of circulation space across the site and attendant impacts on visitor experience, safety and amenity. This includes the need to provide dedicated reflection and respite spaces for veterans and families.	19%
Lack of <i>Disability Discrimination Act 1992</i> Code Compliance	Comments relating to the need for the Memorial to improve accessibility access across the site. This includes recognising that accessibility is not simply meeting requirements for physical access but about delivering an experience for visitors with a disability equal to that offered to those without a disability.	9%

Table 5.4: Need for the Project – Public Comment Key Themes

Memorial's Response

Detailed examination of these comments and the Memorial's response is provided at Section 9.1 of this Report. In response to these comments, the Memorial has provided additional information within [Attachment E](#) of the Preliminary Documentation regarding the need for the project, including specific examples, details of space re-purposed from back of house operations to gallery space over the past two decades, and the Gallery Masterplan to demonstrate how it will better explain the diverse impacts of war within gallery spaces.

5.4.2 *Design Development and Selection*

A total of 21 submissions commented on design development matters relating to the proposal.

Two sub-themes within Design Development and Selection were raised in approximately half of the submissions that commented on this matter – the selection of a precinct-based solution and matters of due process. Refer to [Table 5.5](#) below for the public comment key themes addressing the Design Development and Selection. One noticeable trend within this was that the two issues were almost always raised separately with only one submission raising both, while Design Option 1 issues were almost always raised in unison with broader due process comments.

SUB-THEME	DESCRIPTION	FREQUENCY WITHIN KEY THEME
Design Options – Stage 1 (Initial Business Case)	Comments relating to the projects early design process as delivered through the Initial Business Case.	24%
Design – Options –Precinct Based Solution	Comments relating to the determination that a solution providing additional space on the Campbell site was preferable to use of the Treloar Technology Centre at Mitchell or another distributed model for exhibitions.	52%
Design Options – Due Process	Comments relating to processes and decision making during the design development and selection process, in particular whether heritage matters had been given due weight during this process and whether appropriate examination of prudent alternatives had been undertaken.	48%

Table 5.5: Design Development and Selection – Public Comment Key Themes

Memorial's Response

Detailed examination of these comments, and the Memorial's response, is provided at Section 9.2 of this report.

In 2017 the Memorial commissioned the architectural firm Johnson Pilton Walker Pty Ltd (JPW) to prepare a Site Masterplan (JPW Masterplan 2017) to determine a possible solution to the Project requirements including additional gallery space. In response to these comments, the Memorial has updated its Preliminary Documentation to provide additional clarity relating to decision making processes connected with the JPW Masterplan 2017.

5.4.3 *Description of the Project*

Only three comments were received on this section of the Preliminary Documentation. Two, from the architectural and heritage community, were largely concerned with a lack of detail on proposed changes within the Main Building. The third submission asked for additional information on future long term planning measures within the project design. Refer to [Table 5.6](#) below for the public comment key themes against the description of the public.

SUB-THEME	DESCRIPTION	FREQUENCY WITHIN KEY THEME
Long Term Planning	Comment requesting clarification on what long term planning measures had been included in the project design to allow for future expansion if necessary.	33%
Main Building Changes	Comments requesting additional detail or clarity on changes within the Main Building to be delivered as part of the project.	66%

Table 5.6: Description of the Project – Public Comment Key Themes

Memorial's Response

Detailed examination of these comments, and the Memorial's response, is provided at Section 9.3 of this report.

The Memorial has responded to these comments through a commitment to appoint an appropriate expert heritage advisor as part of the Main Building design and conduct an appropriate heritage impact assessment process, and if required *EPBC Act* referral, for any Main Building works.

5.4.4 *Assessment against the EPBC Act*

Four submissions, three of which from the Architectural/Heritage Community, were received that expressed concern that the Memorial had not adequately included the assessment of the loss of embodied energy and other environmental impacts represented by the proposed demolition in its Preliminary Documentation.

The Memorial has noted that this is not a matter of national environmental significance for assessment under the *EPBC Act* but rather is an issue of construction environmental management planning if approved. Refer to [Table 5.7](#) below for the public comment key themes against the assessment against the *EPBC Act*.

SUB-THEME	DESCRIPTION	FREQUENCY WITHIN KEY THEME
Environmental Impact of Replacement of Anzac Hall	Comments made regarding the environmental impact of the proposed replacement of Anzac Hall.	100%

Table 5.7: Assessment against the *EPBC Act* – Public Comment Key Themes

Memorial's Response

Detailed examination of these comments, and the Memorial's response, is provided at Section 9.4 of this report.

The Memorial has responded to this concern with additional commitments around the recycling or reuse of Anzac Hall materials following demolition to minimise this impact.

5.4.5 Heritage Impacts

A total of 83 submissions commented on heritage matters relating to the proposal.

There are nine key sub-themes within this category. Due to the complex nature of these issues they have been further broken down with each key theme in both the Preliminary Documentation and this response to public submissions. Refer to [Table 5.8](#) below for the public comment key themes against the heritage impacts of the project.

SUB-THEME	DESCRIPTION	FREQUENCY WITHIN KEY THEME
New Southern Entrance	Comments on heritage impacts arising from the New Southern Entrance broken down as the following issues:	25%
	General support for the change	8%
	Changes to the façade	1%
	Support for the change to the visitor arrival experience	4%
	Concerns about the change to the visitor arrival experience	10%
	Structural Risk from Subterranean Connection	5%
	Glass Lift	2%
	Oculus inserted into Main Building forecourt	2%
	Parliament House Vista from the south	22%
	Southern Entrance – Parade Ground level access	1%
New Anzac Hall and Glazed Link	Comments on heritage arising from the New Anzac Hall and Glazed Link	49%
	Replacement of existing Anzac Hall – General Comment	41%
	Replacement of existing Anzac Hall – Specific Comment	10%
	Restoring views of the Main Building in the round	2%
	APH Vista – Glazed Link above the parapet	4%
	APH Vista – from Mount Ainslie	4%
	Glazed Link – General Comment	12%
Bean Building Extension and Research Centre	Comments on heritage arising from the Bean Building Extension and Research Centre	11%
	Bean Building and Research Centre – General Comment	10%
	Bean Building and Research Centre – Impact on Eastern Precinct	2%
Public Realm	Comments on heritage impacts arising from changes to the Public Realm across the entire Campbell site	10%
	Public Realm – General Comment	8%
	Public Realm – Parade Ground Orientation	5%
	Public realm – Cumulative Impact	4%
Australian War Memorial National Heritage Values	Specific comment on impacts on the listed National Heritage Values of the Memorial	2%
	Comment on July 2020 Preliminary Documentation Attachment C Heritage Impact Statement	1%
	Comment on National Heritage Value impacts	1%

SUB-THEME	DESCRIPTION	FREQUENCY WITHIN KEY THEME
Australian War Memorial Commonwealth Heritage Values	Specific comment on impacts on the listed Commonwealth Heritage Values of the Memorial	4%
Parliament House Vista Commonwealth Heritage Values	Specific comment on impacts on the listed Commonwealth Heritage Values of the Parliament House Vista	2%
Social Heritage Values	Comments on social heritage value impacts due to the proposal	60%
	Balance between Commemorative Space and Museum Function	17%
	Inclusion of Withdrawal and Reflection Spaces	7%
	The Memorial as a place of healing	27%
	Education, Learning and Values	18%
	Over emphasis on Social Heritage at the expense of other heritage values	2%
	Impact on National History	5%
	Veterans' Engagement	1%
Indigenous Heritage Values	Comments on Indigenous heritage value impacts due to the proposal	19%
	Representation of Frontier Violence	19%
	Aboriginal and Torres Strait Islander Memorial on Mount Ainslie	1%

Table 5.8: Heritage Impacts – Public Comment Key Themes

Whilst some 33 issues were raised within the nine heritage related sub-themes, there were five issues that stood out as the issues most frequently commented upon:

- The proposed replacement of Anzac Hall was a component of almost half of all submissions commenting on heritage matters. While a small proportion of comments were supportive of this change (<20%) the majority were not (>80%). Support was generally expressed by the Veterans Community whilst the Architectural/Heritage Community in particular were opposed.
- The impact of the Project on the Parliament House Vista from the south was also frequently raised, although support for the changes was in this case more balanced (45% for, 55% against).
- Social heritage as a key theme received the largest number of comments with 50 submissions in this matter. This was the third most commented upon sub-theme after Need for the Project (67 comments) and non-EPBC matters (58 comments). Within this area, two most frequently raised issues were the role of the Memorial as a place of healing and its role as a place of education. Notably both were most frequently raised by the Veterans Community who emphasised the importance and value of these elements to them as a group.
- The representation of frontier violence was also a topic frequently mentioned within a social heritage framework. While in previous consultation this had been raised as an issue of gallery content, there was a marked move within these submissions for fuller representation of these

issues to be recognised as a matter of national and Indigenous social heritage and to be explored within that context. This issue was largely raised by the General Public (>80% of commenters on this issue).

Memorial's Response

Detailed examination of these comments, and the Memorial's response, is provided at Sections 9.5 to 9.13 of this report.

The Memorial has responded to the support and concerns raised in these submissions through changes to a number of details of the project. This includes design revisions to the Oculus, Glazed Link and Parade Ground to reduce the heritage impacts outlined in the July 2020 Preliminary Documentation. These changes, including making the Glazed Link a fully reversible connection to the Main Building have been done in close consultation with DAWE.

Additional detail has also been provided in the Final Preliminary Documentation and revised attachments to detail these changes, or clarify matters raised through public comment.

The Memorial notes that changes to the project are largely in the detail rather than the overall concept, therefore the basic description of the project as replacing Anzac Hall and delivering the New Southern Entrance, Bean Building Extension and Research Centre, remains largely the same.

5.4.6 Heritage and Environment Mitigation Measures

One submission from a member of a community interest group was received that raised concerns with one of the Memorial's mitigation strategies outlined in the Preliminary Documentation. Refer to [Table 5.9](#) below for the public comment key themes against the heritage and environment mitigation measures.

SUB-THEME	DESCRIPTION	FREQUENCY WITHIN KEY THEME
Heritage and Environment Mitigation Measures	One comment was received in response to the Heritage and Environment Mitigation Measures proposed within the Preliminary Documentation.	100%

Table 5.9: Heritage and Environment Mitigation Measures – Public Comment Key Themes

Memorial's Response

Detailed examination of this comment, and the Memorial's response, is provided at Section 9.14 of this report.

There are no changes to the Preliminary Documentation arising from this comment.

5.4.7 Future Gallery Content

38 comments were received on the topic of Future Gallery Content noting that this is a key theme not addressed in the Preliminary Documentation. Refer to [Table 5.10](#) below for the public comment key themes against the future gallery content.

SUB-THEME	DESCRIPTION	FREQUENCY WITHIN KEY THEME
Large Technology Objects	Comments on the issue of the display of Large Technology Objects (LTOs) such as aircraft, tanks or helicopters as part of the Project	95%
Curatorial Content and Approach	Comments or general suggestions for future content or curatorial approaches on themes such as: <ul style="list-style-type: none">▪ Context and Consequence▪ Diverse Representation▪ Aftermath of War▪ Diverse Viewpoints▪ Educational and Museological Approaches▪ Peace	32%
Live ADF Feed	Submissions critical of inclusion of a live feed from the ADF or Defence in the Memorial that would politicise the Memorial.	5%

Table 5.10: Future Gallery Content – Public Comment Key Themes

The Memorial received a substantial number of submissions commenting on the issue of the display of Large Technology Objects (LTOs) as part of the Project with comment largely against an over-reliance on such displays (>60%).

Notably close to two-thirds of the supportive submissions were from the veterans community and the Memorial received no objections to the display of LTOs from those who have served. Objections came largely from the general public with a smaller number from the descendants' community.

As always when the Memorial undertakes consultation, gallery content and curatorial approaches were also on commenter's minds, this process was no exception.

The concept of a live feed of Defence activity was raised by the Memorial in 2018 as a potential way for visitors to better understand what the Australian Defence Force (ADF) does. In 2019 the Memorial decided not to proceed with a live feed or similar project for a variety of reasons, including concerns raised by the community, and it is not a part of the proposal put forward through the Preliminary Documentation.

Memorial's Response

Detailed examination of these comments, and the Memorial's response, is provided at Section 9.15 of this report.

The Memorial has made substantial additions to its Final Preliminary Documentation in relation to issues raised in this key theme including the provision of its Gallery Masterplan and Stakeholder and Community Engagement Management Plan as new attachments to the FPD as [Attachment E](#) and [Attachment S](#).

5.4.8 Due Process

A total of eight comments were received on matters of due process noting that this is a key theme not addressed in the Preliminary Documentation. The majority of these submissions were received from the Architectural/Heritage Community and Community Interest Groups. Refer to [Table 5.11](#) below for the public comment key themes against the due process undertaken.

SUB-THEME	DESCRIPTION	FREQUENCY WITHIN KEY THEME
Project Consultation	Comments received relating to the conduct of consultation processes connected with the Project broadly concerned with a perceived lack of consultation with the public or authorities.	50%
Other approvals processes	Comments relating to other approvals processes, in particular Parliamentary Works Committee and NCA approvals, for the proposal and the connection(s) between these processes.	25%
Preliminary Documentation Excessive, Confusing or Poorly Prepared	Comment on the quality of the Preliminary Documentation itself.	38%
Separation of project elements for approval(s) process(es)	Comments relating the separation of some approvals processes or project elements from the main EPBC referral including the car park extension works and the future Main Building works.	38%
Heritage Management Plan	Comment on either the proposal not meeting the Memorial's <i>Heritage Management Plan 2011</i> or the Memorial not having an approved updated Heritage Management Plan 2019/20 in place for the proposal to be assessed against	75%

Table 5.11: Due Process – Public Comment Key Themes

The issue most frequently raised related to several project elements breaching conservation policies outlined in the *Heritage Management Plan, 2011*. The Memorial has acknowledged and detailed elements of the proposal inconsistent with individual policies within the *Heritage Management Plan, 2011*. The Memorial notes, however, the proposal is consistent with its overall heritage management framework.

Memorial's Response

Detailed examination of these comments, and the Memorial's response, is provided at Section 9.16 of this report.

The Memorial has noted these comments, but believes the process followed is compliant with all requirements and did not make any changes in relation to the Final Preliminary Documentation arising from these matters.

5.4.9 *Non-EPBC Matters*

Refer to [Table 5.12](#) below for the public comment key themes against non-EPBC matters raised. The Memorial notes that these are not matters under consideration through its Preliminary Documentation or *EPBC Act* process.

SUB-THEME	DESCRIPTION	FREQUENCY WITHIN KEY THEME
Project Cost	Comment on the cost of the proposal.	41%
Cost Effectiveness of replacing Anzac Hall	Comment on the cost effectiveness of replacing Anzac Hall.	14%
Defence Industry Sponsorship	Comment on the Memorial's policy regarding accepting sponsorship or in-kind support from the Defence Industry.	16%
Alternative projects or funding opportunities	Comment and suggestions on other ways to spend the funding allocated to the Memorial's Project.	67%

Table 5.12: Non-EPBC Matters – Public Comment Key Themes

Memorial Response

These comments have been recorded in this report for completeness and background only in Section 9.17 of this report; the Memorial has not provided a response to these issues.

The Memorial notes that matters of cost effectiveness and project cost are under active consideration by the Parliamentary Works Committee (PWC) at the time of writing this report.

There are no changes to the FPD arising from these comments.

6 ACTIONS TAKEN DURING AND AFTER PRELIMINARY DOCUMENTATION EXHIBITION

6.1 Consultation with the Department of Agriculture, Water and the Environment

The Memorial has undertaken extensive consultation with DAWE since the release of its Preliminary Documentation. Through the series of meetings, DAWE has identified five key heritage design considerations for the Memorial to address in the following sections.

6.1.1 *Lowering the roof of both the Glazed Link and the New Anzac Hall to below the parapet line of the Main Building*

- Lowering the roofline of the Glazed Link and New Anzac Hall would result in a reduced impact on the values of both the Memorial and the Parliament House Vista when viewed from the south. This would allow the Memorial to retain the Glazed Link in a suitable way rather than removing it entirely.
- The Parliament House Vista is a highly sensitive view-line which is recognised in multiple heritage listings. The Memorial has previously proposed versions of the Glazed Link with a lower height below the parapet which may still be a viable option.
- These design changes will reduce visibility of the Glazed Link and New Anzac Hall from the south and from within the Parliament House Vista (Criterion E CHL and NHL; Criterion E and F Parliament House Vista CHL).

6.1.2 *Specification of a lower opacity rate on the Glazed Link's ETFE roof panels*

- The current opacity rate of the ETFE panels will have a significant impact on the relative visual isolation and primacy of the original Memorial building (Criterion F CHL and Criterion E NHL) as it will obscure views to the Main Building from the north (both within the Glazed Link and externally).
- The current opacity rate of the ETFE panels will also make them highly visible within the Parliament House Vista from the south (Criterion E and F Parliament House Vista CHL).
- Opacity is important for thermal comfort; however the visual impact of this design feature is high. A more balanced approach should be considered, to enable the Glazed Link to be retained with lower visual impacts.
- Options may include making the current ETFE panels more transparent or reinstating the originally proposed glass with a slightly darker tint. This, coupled with a lower roof line (below parapet) may help to reduce the impact of the Glazed Link.

6.1.3 *Fixture of the Glazed Link to the original building to be redesigned (no channel setting and Glazed Link to join at the corners of the original building)*

- The current proposed method of fixing the Glazed Link to the original building is by cutting a vertical channel into the original stone masonry causing avoidable permanent damage to the building fabric (Criterion A and E NHL and Criterion A CHL).
- A different engineering solution to the fixture of the Glazed Link to the original building may lower its impact to an acceptable level and still provide the functional requirements of the Memorial.

- The expert stone report commissioned for the PD states that different weathering rates of the original building stonework could be minimised if the Glazed Link joins at the corners of the original building. This advice has not been actioned in the documentation presented within the PD.

6.1.4 *Removal of the glass elevator in the eastern part of the Southern Entrance*

- Reflection from the glass elevator could have an impact on the values of both the Parliament House Vista and the Memorial. Removal of this element will reduce the impact of the Southern Entrance on the Parliament House Vista and aesthetic values of the Memorial (Criterion E CHL and NHL; Criterion E and F Parliament House Vista CHL).
- The view along the parade is highly sensitive; the elevator will be visible along the Parade from a range of distances due to its high reflection value and is a clear anachronistic addition within the precinct.
- There are other accessible routes within the redevelopment to both the forecourt and the new Southern Entrance. Removal of the glass elevator may not change the functionality or intention of the new Southern Entrance.
- The Memorial should review the accessibility at the Southern Entrance without the need for the glass lift. If it is required, then other finishes or landscaping should be considered to minimise the visual impact along the Parliament House Vista.

6.1.5 *Removal or Design Alteration of the Oculus element in the Southern Entrance*

- The Oculus will be visible along Anzac Parade which is a highly sensitive vista. Removing or altering the design of the Oculus will reduce the impact of the Southern Entrance on the Parliament House Vista and Aesthetic values of the Memorial (Criterion E CHL and NHL; Criterion E and F Parliament House Vista CHL).
- While the Oculus is proposed to be of a low height, the nature of the design requires a handrail around the feature. The Oculus and associated handrail may create visual clutter and distract from the isolation of the original main building and its intended ability to be viewed as a monumental entrance.
- There may be opportunity for the Memorial to retain the Oculus as a design feature but alter the above ground design to minimise its impact e.g.: add an extra layer of protective glass to enclose the oculus and remove the trip hazard without the presence of a handrail.
- The Memorial should review the design of Oculus to reduce the handrail clutter and impacts to the Parliament House Vista and the aesthetic values of the Australian War Memorial from the new Southern Entrance.

6.2 Department of Agriculture, Water and the Environment Engagement

The Memorial has undertaken engagement with DAWE on the following occasions:

6.2.1 *EPBC Preliminary Documentation Meetings*

- 9 July 2020
- 4 August 2020
- 11 August 2020
- 4 September 2020

6.2.2 *Site Visit by DAWE Officers*

- 31 July 2020

6.2.3 *Site Visit by the Minister of the Environment, the Hon Sussan Ley MP*

- A 90-minute site visit and project briefing was undertaken by the Minister of the Environment on 14 September 2020.

6.3 Refinement of design detail

Through July to September 2020 the Memorial continued working with the project design team to refine and resolve design elements across the project. Changes made through these efforts, typically in co-ordination with feedback from the public and DAWE is reflected in the updated plans, drawings and diagrams in the Final Preliminary Documentation.

7 CHANGES TO THE PRELIMINARY DOCUMENTATION

7.1 Minor Errors and Discrepancies

The public comment process included a number of submissions that pointed out minor errors or discrepancies in the documentation released on 3 July 2020 for comment. The minor errors and amendments are noted in the following section.

7.1.1 *Section 4.5.3 Competition Assessment Criteria*

Added sub-criteria (h) and (i) to reflect combined list of criteria for both design packages.

7.1.2 *Section 5.3.5 New Southern Entrance Images*

The bottom left image was captioned as “View from the east” which has been updated to “View of the eastern entry”. The top right image was captioned “View from the west” which has been updated to “View from the western entry”.

7.1.3 *Section 7.8.2 Criterion E - Aesthetic Characteristics*

The criteria description incorrectly includes the first paragraph of the response in the attributes section. This paragraph has been shifted to the correct location, Section 7.8.2 in the Final Preliminary Documentation.

7.1.4 *Section 7.9.8 Accessibility Improvements*

This section incorrectly stated that visitors seeking lift access via the front of the building must wait for staff assistance. This statement has been corrected.

7.1.5 *Section 8.3.5 Mitigation Strategy 5 – Anzac Hall – Future Flexibility for Expansion*

This section incorrectly refers the reader to Section 4.5.2 in relation to the expansion of Anzac Hall not being a feasible option. This reference should be to Section 4.4.2.

7.2 Changes to Attachments

The following changes in attachments were made from the July 2020 to September 2020 Preliminary Documentation submissions as evident in [Table 7.1](#) below.

Table 7.1 – Changes in attachments

July 2020 Submission		September 2020 Submission		Change from July 2020 – Sept 2020
NO	DESCRIPTION	NO	DESCRIPTION	
A	Original Referral, October 2019	A	Original Referral, October 2019	No change
B	Variation to Referral, February 2020	B	Variation to Referral, February 2020	No change
		C	Response to Public Submissions	This Response to Public Submission report becomes new Attachment C
C	Heritage Impact Statement, June 2020 – <i>By Hector Abrahams Architects</i>	D	Heritage Impact Statement, September 2020 – <i>By Hector Abrahams Architects</i>	HIS changed from Attachment C to Attachment D and report updated
D	Afghanistan and East Timor – Examples of the Lack of Capacity to Recognise All Conflict and Operations	E	Need for the Project	Attachment D becomes Attachment E1
			<i>E1 Examples of Under-Represented Conflicts</i> <i>E2 Examples of Exhibits Depicting the Broader Context of War</i> <i>E3 Gallery Masterplan</i> <i>E4 Current and Proposed Circulation Comparison</i>	Attachments E2, E3 and E4 added
E	Memorial Development Project Site Wide Render	F	Memorial Development Project Site Wide Renders	Attachment E becomes Attachment F Renders updated
F1	New Southern Entrance Renders	G	New Southern Entrance Design Response	Attachments F1 and F2 become Attachment G1
F2	New Southern Entrance Drawings		<i>G1 Drawings and Renders from 3 July 2020 Response</i> <i>G2 Description of Technical Issues Received</i> <i>G3 Architectural Response to Technical Issues Received</i> <i>G4 Visual Representation of Options Explored by the Architects, September 2020</i> <i>G5 Updated Drawings and Renders, September 2020</i>	Attachments G2, G3, G4 and G5 added Drawings and Renders updated
G1	Connection Detail between Main Building and Glazed Link	H	New Anzac Hall and Glazed Link Design Response	Attachments G1, G2 and G3 become Attachment H1
G2	New Anzac Hall and Glazed Link Renders		<i>H1 Drawings and Renders from 3 July 2020 Response</i> <i>H2 Description of Technical Issues Received</i> <i>H3 Architectural Response to Technical Issues Received</i> <i>H4 Details of Design Improvements and Justifications in Response to Issues Raised by DAWF</i> <i>H5 Glazed Link Energy Performance</i> <i>H6 Updated Drawings and Renders, September 2020</i>	Attachments H2, H3, H4, H5 and H6 added Drawings and Renders updated
G3	New Anzac Hall and Glazed Link Drawings			
H1	C.E.W. Bean Building Extension and Research Centre Renders	I	C.E.W. Bean Building Extension and Research Centre Drawings and Renders	Attachments H1 and H2 become Attachment I

				Drawings and Renders updated
H2	C.E.W. Bean Building Extension and Research Centre Drawings			
I	Public Realm Drawings	J	Public Realm Concept Design, September 2020	Attachment I becomes Attachment J Drawings and Renders updated
J1	Eastern Car Park Heritage Impact Statement – <i>By International Conservation Services</i>	K1	AWM Eastern Carpark Extension Heritage Impact Statement – <i>By International Conservation Services</i>	Attachments J1 and J2 become Attachments K1 and K2 K2 render updated
J2	Eastern Carpark Extension Comparison Between Existing Landscape and Proposed	K2	Eastern Carpark Extension Comparison Between Existing Landscape and Proposed	
K	Australian War Memorial Policy for use of Functions Facilities, May 2020	L	Australian War Memorial Policy for use of Functions Facilities, May 2020	Attachment K becomes Attachment L No change to policy
L	Stone Report 1 – Stone Replacement – <i>By Jasper Swann</i>	M	Stone Report 1 – Stone Replacement – <i>By Jasper Swann</i>	Attachment L becomes Attachment M No change to report
M	New Southern Entrance Architectural Heritage Response – <i>By Scott Carver</i>			Attachment M becomes Attachment G1
N	Façade Engineer Glass Lift Advice – <i>By Prism Façades</i>	N	Façade Engineer Glass Lift Advice – <i>By Prism Façade</i>	Advice updated
O1	View Lines Along Anzac Parade Context Plan	O1	View Lines Along Anzac Parade Context Plan, September 2020	Attachments O1 and O2 combined to make new Attachment O1 Attachment O3 becomes Attachment O2 Updated renders
O2	View Lines Along Anzac Parade	O2	View Lines Along Anzac Parade, September 2020	
O3	Existing and Proposed Comparison at 250 Intervals along Anzac Parade			
P	Glare Impact of Glazed Link ETFE Roof – <i>By Prism Façades</i>	P	Glare Impact of Glazed Link ETFE Roof – <i>By Prism Façades</i>	No change
Q1	View from Mount Ainslie – Magnified	Q	Views from Mount Ainslie	Attachments Q1 and Q2 combined to make new Attachment Q Renders updated
Q2	View from Mount Ainslie – Naked Eye			
R	Stone Report 2 – Impact of the Glazed Link – <i>By Jasper Swann</i>	R	Stone Report 2 – Impact of the Glazed Link – <i>By Jasper Swann</i>	Report updated
S1	EPBC Act National Consultation Report	S	Stakeholder Consultation <i>S1 DBC Consultation Report</i> <i>S2 EPBC Act National Consultation Report</i> <i>S3 Indigenous Representation Consultation Summary</i> <i>S4 Indigenous Consultation Event Report, January 2020</i> <i>S5 Stakeholder Engagement Plan</i>	Attachment S1 becomes Attachment S2 Attachment S2 becomes Attachment S1
S2	DBC Stakeholder Engagement and Consultation Report			Attachment T1 becomes new Attachment S3 Attachment T2 becomes new Attachment S4 Attachment S5 added

T1	Indigenous Representation Consultation Summary	-	Attachment T1 becomes new Attachment S3
T2	Indigenous Consultation Event Report, January 2020	-	Attachment T2 becomes new Attachment S4

7.3 Changes to September 2020 Preliminary Documentation Text

7.3.1 Updated Section 1.4 this Preliminary Documentation Response

Updated text to reflect change from Preliminary Documentation to Final Preliminary Documentation.

7.3.2 New Section 1.5.7 Nature Conservation Act (NC) 2014

Additional section at the request of DAWE, added descriptor is in response to Section 6 of the PD.

7.3.3 Updated Section 3.3 Public Comment on Need for the Project

Updated section reflecting the Memorial's response to public comments on the need for the project which includes the addition of Attachment E to the FPD.

7.3.4 Updated Section 3.4 Lack of Capacity to Recognise All Conflicts and Operations

Refers to updated information in Attachment E1 to the FPD.

7.3.5 Updated Section 3.5 Lack of Capacity to Exhibit a Broader Context of War

Refers to updated information in Attachment E2 to the FPD.

7.3.6 Updated Section 4.2.5 Use of Audio-visual Technology in Lieu of Gallery Space

Minor clarifications to response.

7.3.7 New Sections 4.4.9- 4.4.12 JPW Masterplan 2017

Additional sections in response to public comment on whether the Memorial properly considered the JPW Masterplan 2017 during the design development phase. Sections clarify why the JPW Masterplan 2017 did not meet the project design brief.

7.3.8 Updated Section 4.4.6 Heritage Considerations of Options Assessment

New heritage consideration of options assessment added under (c) *Mount Ainslie Views*. Note that the following sections were renumbered accordingly (d-f).

7.3.9 New Section 4.6.6 Moral Rights

Added section describing the moral rights consultation process.

7.3.10 Updated Section 5.1 Overview of Functional Brief

Minor updates of spaces to be delivered by the project following the design changes made in response to public comment and feedback from DAWE.

7.3.11 Updated Figures 5.1A, 5.1B, 5.8

Updated imagery design changes made in response to public comment and feedback from DAWE.

7.3.12 New Figures 5.3C, 5.4B and 5.10B

New imagery added in response to public comment and feedback from DAWE to demonstrate changes between the July 2020 and September 2020 Preliminary Documentation submission.

7.3.13 *New Section 5.3.2 New Southern Entrance Attachments*

Additional section in response to the public's and DAWE's comments on the New Southern Entrance particularly on the glazed lift and Oculus. Includes the addition of Attachment G to the FPD.

7.3.14 *New Section 5.3.3 Response to Public and DAWE Comments*

Additional section in response to the public's and DAWE's comments on the New Southern Entrance particularly on the glazed lift and Oculus. Refer to Attachments G2 and Attachment G3 of the FPD. Note the subsequent sections were renumbered accordingly.

7.3.15 *New Section 5.3.4 New Southern Entrance Lighting Solution*

Additional section in response to public comment on lighting impacts of the project. Note the subsequent sections were renumbered accordingly.

7.3.16 *Updated Section 5.4 Anzac Hall and Glazed Link*

Renumbered from 5.2.4 in the July 2020 submission. Note the subsequent sections were renumbered accordingly.

7.3.17 *New Section 5.4.3 Anzac Hall and Glazed Link Attachments*

Additional section in response to the public's and DAWE's comments on Anzac Hall and the Glazed Link. Includes the addition of Attachment H to the FPD

7.3.18 *New Section 5.4.4 Response to Public and DAWE Comments*

Additional section in response to the public's and DAWE's comments on the New Anzac Hall and Glazed Link. New Figure 5.3C added to response.

7.3.19 *New Section 5.4.5 Reversibility*

Additional section in response to the public's and DAWE's comments on the reversibility of the Glazed Link. Refer to Attachment H4 in the FPD.

7.3.20 *New Section 5.4.6 Height of the New Anzac Hall*

Additional section in response to the public's and DAWE's comments on the height of the New Anzac Hall and Glazed Link.

7.3.21 *Updated Section 5.5.2 Bean Building Extension and Research Centre Images*

Updated section capturing updated Attachments I of the FPD.

7.3.22 *Updated Section 5.6 Public Realm*

Updated section capturing updated Attachments J of the FPD.

7.3.23 *New Section 5.7 Parade Ground*

Additional section describing how the Memorial has addressed the comments from the public and DAWE through refinement of the proposed changes to the Parade Ground by the addition of the new Figure 5.10B.

7.3.24 *New Section 5.8 Eastern Precinct Car Park Extension Works*

Renumbered from Section 5.2.12 of the July 2020 submission, noting these works have now achieved practical completion.

7.3.25 Updated Section 6: Assessment against the EPBC Act 1999 for Works on Commonwealth Land

New sections added regarding environmental impact of works on Commonwealth Land at the direction of DAWE as sub-sections 6.3 – 6.13 inclusive.

7.3.26 New Section 9: Economic Benefit

New section added to reflect the economic benefits derived from project implementation based on finance modelling undertaken by KPMG during the preparation of the Detailed Business Case. Note subsequent sections renumbered accordingly.

7.3.27 Updated Section 10 Conclusion

Updated Preliminary Documentation Conclusion.

7.3.28 Updated Section 11 List of Attachments

Updated list of attachments.

7.4 Changes to Section 7 Impacts on Values

7.4.1 Delete Section 7.2.3(b) Visitor Engagement Technology

Section deleted.

7.4.2 Section 7.2.6 Change 5: Oculus inserted into Main Building forecourt

Added Figure 7.2 Sightlines from the New Southern Entrance to the dome through the oculus.

7.4.3 Updated Section 7.3.3 Change 2: Restoring Views of the Main Building in the Round

Added sub-section 7.3.3(a) Activation and Occupied Space to reflect improvements to the ability to appreciate the rear elevation of the Main Building in the round by activating the space within the Glazed Link to attract visitors in to experience the rear of the building, which is a view that is not generally experienced by visitors currently as it is merely a space between buildings.

7.4.4 Updated Section 7.3.5 Change 4: Parliament House Vista – From Mount Ainslie

Text updated to reflect changes to the Glazed Link reducing the impact on this vista by more closely following the parapet of the Main Building, thus enabling the form of the Main Building to be maintained from this viewing point.

7.5 Changes to Section 8 Heritage and Environment Mitigation Measures

7.5.1 Section 8.1 Memorial Approach to an Evolving Institution

Additional text clarifies how the four main elements of the project contribute to the evolution of the Memorial.

7.5.2 Section 8.3.1 Mitigation Strategy 1 – Minimise Above Ground Changes to the Precinct

Added sub-sections a, b, and c to clarify mitigations undertaken to minimise above ground changes.

7.5.3 Section 8.3.4 Mitigation Strategy 4 – Use of Appropriate Precedents in Design Solutions – Glazed Link

Addition of examples of atria being connected to heritage buildings.

7.5.4 **Section 8.3.5 Mitigation Strategy 5 – Anzac Hall – Future Flexibility for Expansion**

Clarified expansion capacity of New Anzac Hall through additional wings. A plan showing where the wings could be extended is included in the [Attachment H](#) drawing set to the FPD.

7.6 **Summarised List of Commitments**

Below is a summarised list of commitments the Memorial has made in relation to heritage and process matters. *Commitment 1* relates to section 8 of the Preliminary Documentation, and *Commitments 2-5* are as a result of the RtPS. The summarised list is available at [Appendix B](#) of this RtPS report.

7.6.1 **Commitment 1 – Mitigations through Process and Design Strategies**

The Memorial commits to delivering the following 17 mitigation strategies as detailed in Section 8.3 of the Final Preliminary Documentation.

- Mitigation Strategy 1 – Minimise Above Ground Changes to the Precinct
- Mitigation Strategy 2 – Retain Prominence of Existing Stairs and Commemorative Area
- Mitigation Strategy 3 – Use of Appropriate Precedents in Design Solutions – New Southern Entrance
- Mitigation Strategy 4 – Use of Appropriate Precedents in Design Solutions – Glazed Link
- Mitigation Strategy 5 – Anzac Hall – Future Flexibility for Expansion
- Mitigation Strategy 6 – Use of a Design Competition to Select Architects and Design
- Mitigation Strategy 7 – Selection of Skilled Architects and Engineers
- Mitigation Strategy 8 – Quality in Design and Construction
- Mitigation Strategy 9 – Environmental Management in Design and Construction
- Mitigation Strategy 10 – Engage Appropriate Advice
- Mitigation Strategy 11 – Use of Original Quarries
- Mitigation Strategy 12– Monitoring for Structural Impacts
- Mitigation Strategy 13– Anzac Hall – Record and Tell the History
- Mitigation Strategy 14 – Photographic Recording
- Mitigation Strategy 15 – Public Interpretation
- Mitigation Strategy 16 – Consultation with RAOs
- Mitigation Strategy 17 – Environmental management throughout construction

7.6.2 **Commitment 2 – Heritage and Process Commitments**

The Memorial makes the following heritage and process commitments:

7.6.2.1 **Commitment 2A – Main Building – Heritage Advice**

The Memorial will appoint an appropriate expert heritage advisor as part of the Main Building design process.

7.6.2.2 **Commitment 2B – Main Building – Heritage Assessment**

The Memorial will undertake a formal Heritage Impact Assessment, and if necessary further *EPBC Act* referral, for future Main Building architectural or engineering works delivered as part of the Project.

7.6.2.3 **Commitment 2C – Retention of public access to existing Main Building Foyer**

The Memorial will retain the existing entrance to the Commemorative Area through the Main Building Foyer at completion of construction for any and all visitors in the same manner as entry is undertaken today.

7.6.2.4 *Commitment 2D – Anzac Hall – Community Memories*

The Memorial will undertake a research project to prepare a representative sample of these memories from designers, veterans and visitors as part of Mitigation Strategy 15 – Public Interpretation to ensure that these public memories are recorded as part of the National Collection and made available to future generations.

7.6.2.5 *Commitment 2E – Activating views in the round of the Main Building*

The Memorial will train Visitor Services staff and volunteers to ensure they are able to assist visitors to understand and appreciate the importance of the ability to view the Main Building in the round while in the Glazed Link to maximise the use of the Main Building in this context. The Glazed Link will bring more visitors to the back of the building to appreciate the form of the Main Building.

7.6.2.6 *Commitment 2F – National Capital Authority Approvals*

The Memorial will undertake National Capital Authority planning approvals required for the Project following relevant Parliamentary Works Committee and EPBC approvals.

7.6.2.7 *Commitment 2G – Veterans and Defence Family Opportunity and Engagement Plan*

The Memorial will ensure Veterans and Defence family community are able to access employment and business opportunities through the project, which will be achieved through the Memorial's Veterans and Defence Family Opportunity and Engagement Plan.

7.6.2.8 *Commitment 2H – Unit Memorial Plaques*

The Memorial will conduct a heritage impact assessment of any plaques that require relocation in accordance with its *Heritage Management Plan 2011*. The Memorial will work with key stakeholders for any affected plaque to agree a new location and undertake a dedication ceremony for any relocated plaques if desired by stakeholders.

7.6.3 *Commitment 3 – Design and Construction Commitments*

The Memorial makes the following commitments in relation to design and construction matters:

7.6.3.1 *Commitment 3A – Fully Reversible Glazed Link*

The Memorial will design, engineer and install a fully reversible Glazed Link design that can be removed without damage to the Main Building in future if necessary.

7.6.3.2 *Commitment 3B – Anzac Hall building material reuse*

The Memorial will reuse/recycle/repurpose as much of the Anzac Hall building material as practical consistent with the National Waste Policy Action Plan 2019.

7.6.3.3 *Commitment 3C – Oculus Detailing*

The Memorial will work with DAWE and the NCA to ensure appropriate final detailing for the oculus is agreed and delivered.

7.6.3.4 *Commitment 3D – New Southern Entrance Glazed Lift*

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.

7.6.3.5 *Commitment 3E – Withdrawal and Reflection Spaces*

The Memorial will engage appropriately qualified consultants with relevant experience in dealing with veterans' mental health to provide key input into the design of the proposed withdrawal and reflection spaces.

7.6.4 **Commitment 4 – Landscaping Commitments**

The Memorial makes the following commitments in relation to landscaping matters:

7.6.4.1 **Commitment 4A – Tree Layouts**

The Memorial will agree the tree layout solution for each public realm area with the NCA in order to ensure an appropriate landscape character is maintained.

7.6.4.2 **Commitment 4B – Landscape Climate Advice**

The Memorial will seek expert landscape advice on the impact of climate change on landscape elements of the project including specifying native and drought resistant plant species across the site.

7.6.4.3 **Commitment 4C – Landscape – Heritage Impact Assessment**

The Memorial will undertake a heritage impact assessment of landscape designs at the detailed design stage, including consultation with the NCA and assessment by a heritage landscape architect to agree final design outcomes.

7.6.5 **Commitment 5 – Future Galleries Content**

Although future galleries content is not necessarily part of this current *EPBC Act* assessment, in response to community submissions the Memorial makes the following commitments in relation to future galleries content:

7.6.5.1 **Commitment 5A – Future Galleries Content - Heritage Assessment**

The Memorial will undertake a formal Heritage Impact Assessment, and if necessary further *EPBC Act* referral, for future gallery works delivered as part of the Project.

7.6.5.2 **Commitment 5B – Future Galleries Content - Community Engagement**

The Memorial will ensure high levels of community input into future exhibition content development to meet community needs and expectations. Social heritage values will underpin exhibition development with input from key audience groups, including veterans and their descendants. This will be achieved through the strategies being developed through the project's Stakeholder and Community Engagement framework.

7.6.5.3 **Commitment 5C – Future Galleries Content - Universal Access and Inclusion Peer Group**

The Memorial will implement a Universal Access and Inclusion Peer Review Group as part of its Stakeholder and Community Engagement Management Plan. This group will be inclusive and representative of peoples with diverse needs and those who care for them. Opportunities for review and feedback on exhibition design documentation during the concept and developed design stages have been mapped. This Peer Review group will focus on universal access and inclusion, ensuring that the project meets best practice benchmarks and delivers against audience needs.

7.6.5.4 **Commitment 5D – Frontier Violence**

The Memorial will establish and engage with a Memorial Aboriginal and Torres Strait Islander Advisory Group on the issue of First Peoples views of representation of frontier violence and other Indigenous matters within the galleries.

7.6.5.5 **Commitment 5E – Aboriginal and Torres Strait Islander Advisory Group**

The Memorial will establish and engage with a Memorial Aboriginal and Torres Strait Islander Advisory Group on all exhibition content and design.

8 UPDATED PROJECT DESCRIPTION

The Project will deliver the following outcomes as defined in the Project's Functional Design Brief and demonstrated in the Reference Design:

- a. total new space in the Anzac Hall and Glazed Link of 13,995 square metres consisting of:
 - i. lower gallery area of 2,964 square metres;
 - ii. main level gallery area of 3,448 square metres;
 - iii. mezzanine gallery and viewing area of 465 square metres;
 - iv. Glazed Link public space of 2,176 square metres; and
 - v. respite areas, amenities, circulation, back of house support and plant across all levels of 4,943 square metres.
- b. total new space for the New Southern Entrance consisting of public entrance and cloak, bookshop, theatre and function room, flexible gallery and plant of 3,450 square metres;
- c. total new space for the Bean Building Extension and Research Centre, archive and collection support functions of 7,299 square metres;
- d. total refurbished space in the existing Bean Building of 2,944 square metres; (Note: Approval for the internal refurbishment works is not included in this submission);
- e. the Main Building refurbishment of galleries, educational functions and enhanced circulation is subject to a later heritage process that is likely to commence in 2024 with refurbishment works to commence in mid-2024. (Note: Approval for the internal refurbishment works is not included in this submission other than the works at the connection of the New Southern Entrance to the Main Building which is described in the Southern Entrance description);
- f. an extension to the underground car park in the eastern precinct under Poppy's Café to provide an additional 123 permanent car parks (this was varied from the Detailed Business Case solution to reduce the impact of an above ground car park on Remembrance Park);
- g. reshape the Parade Ground to return it to its original rectangular shape and improve the terraced seating and accessibility for visitors in wheelchairs; and
- h. improvements to the Public Realm with a focus on providing safe and pedestrian paths from the car parking and bus parking through to the Memorial visitor and education program entrances that are compliant with the *Disability Discrimination Act 1992*.

8.1 Key Design Elements

8.1.1 New Southern Entrance

The proposed New Southern Entrance is located below the existing forecourt, and will improve the visitor arrival experience, support enhanced visit planning and orientation, and provide universal access. The existing forecourt, stairs and entrance will remain as a primary entrance for visitors and dignitaries as it is now. The facility will enhance visitor orientation by improving security screening capability and providing added visitor functions including a 250-person theatre, function room and public amenities. The New Southern Entrance will be accessed from both the east and west, have direct path access from the western surface car park, and be immediately connected to the underground car park to the east via the courtyard.

Visitors will enter the lower level of the Main Building via the central stairs, traversing the same axial path as the original entrance above. They will select to either continue ahead into the galleries, or ascend the flanking stairs (east and west) to arrive adjacent to the Commemorative Area (Pool of Reflection, Roll of Honour and Hall of Memory). Use of the lift will cause arrival in the same location as current, near the Menin Gate lions.

There are a number of precedents for altering entrances to significant heritage buildings to allow for better visitor access and provision for visitors with accessibility requirements. The two state memorials, Anzac Memorial in Hyde Park in Sydney and the Shrine of Remembrance in Melbourne, exemplify the positive outcome of changing the visitor entrance experience whilst retaining the relevance and importance of the original entrance. The grand changes to the entrance to the Louvre completely changed the visitor sense of arrival and have been lauded as not impacting negatively on the World Heritage Precinct of the River Seine in France.

8.1.2 *Anzac Hall and Glazed Link*

This component of the Project includes the replacement of the existing Anzac Hall and provides a connection from the New Anzac Hall to the Main Building via a Glazed Link. The new two-level Anzac Hall will be a purpose-built facility to house and display exhibitions, including Large Technology Objects. Anzac Hall is to be constructed in the location of the existing Anzac Hall and will approximately double the area of the purpose-built gallery. The new Glazed Link is proposed to make use of the high-value space between the rear of the Main Building and Anzac Hall. A key feature of this space is to provide a major breakout space at the mid-point of the exhibition journey of the visitor. The Memorial has no such space at present.

The Glazed Link will strengthen and improve connectivity between the Main Building and Anzac Hall, thereby improving the visitor experience and enhancing circulation. This proposal for Anzac Hall and Glazed Link will provide the majority of the additional gallery space for the benefit of all visitors and the appropriate recognition of veterans. The Functional Design Brief has detailed a requirement for an additional 5,500 square metres of galleries, and the increase in gallery space within the Anzac Hall will contribute approximately net 4,000 square metres, taking into account the existing building. This equates to 73% of the additional gallery space for the Project.

The approach to deliver a highly functional building will be to design entry and exit paths for both large and small objects to be changed over quickly and at low cost. The technology and multimedia system will include a substantial number of backbone cables laid throughout the building to ensure flexibility for audio-visual display for the initial displays and well into the future.

The large exhibition areas are high, contiguous spaces which can in turn be sub-divided to accommodate a wide range of gallery layouts into the future. The larger spaces will be complimented with a selection of smaller, more intimate fixed galleries. To tell the stories in detail for visitors it is essential that a variety of spaces be created to link the equipment to the human stories of the servicemen and women.

The Memorial has consulted with the architects of the current Anzac Hall as part of the moral rights process. The design concept is deferential to, and respectful of, the Main Building consistent with the current Anzac Hall. There is minimal visible impact to the Memorial when viewed from Anzac Parade.

The circular shape of the southern wall of the new Anzac Hall retains the capacity to view the Main Building “in-the-round” from within the new Glazed Link and from key vistas outside the building. The

inclined roof of the new Anzac Hall, and the east and west access roads reduce the apparent scale of the new Anzac Hall adjacent to the Main Building and effectively integrate the building into the campus.

8.1.3 *Bean Building Extension and Research Centre*

The Bean Building Extension and Research Centre will enable operational and non-critical administration functions to be relocated out of the Main Building. The extension and refurbishment will enable the relocation of the National Collection Branch to an area closer to the archives and loading dock, and will directly connect to the Research Centre. This will significantly improve the function of the National Collection Branch. The Research Centre will relocate from the northern end of the Main Building into a new area adjacent to the Poppy's Café (to the east). It will integrate with the Bean Building to provide efficient and secure access to the National Collection, and create a light filled area more attractive to the public, which will promote the Memorial's research function.

It is documented as part of the decision-making processes of the Project that the primacy of the Main Building from a heritage and vista point of view has driven façade, colourisation, surface treatments and other visible design elements of the proposed Bean Building Extension and Research Centre.

8.1.4 *Public Realm*

The Public Realm works include a range of works to improve the visitor experience through better pedestrian accessibility and connectivity from the time of arrival through to the Memorial buildings and landscape destinations. The Public Realm includes hard and soft landscape, precinct security, external seating, and small shade structures. It does not include any significant vertical structures.

8.1.5 *Parade Ground*

The New Southern Entrance has been designed to a level complimentary to the Stone of Remembrance and Parade Ground, providing good visual connection. Restricted access (via glazed doors) ensures equitable access when required. The Parade Ground is retained but the shape of its (splayed) sides is to be remodelled to aid military formations and viewing of events. The 'squared up' shape of the Parade Ground now improves the conduct of prescribed military formations, ensuring sufficient space for vehicles to manoeuvre around man guards during events.

The new sides are aligned to be parallel to Anzac Parade, and dimensionally equivalent to the Memorial's front façade. The grass bank on the northern side, supporting the entrance terrace is made into a building façade, partly embedded in sloping plantings at each end. The existing stairs from the Parade Ground are reconstructed in sandstone at a constant width which is parallel to the sandstone pillars which are the highest point of the front façade of the Memorial Main Building.

8.1.6 *Eastern Precinct Car Park Extension Works*

The extension to the underground Poppy's Café Car Park achieved practical completion on 8 August 2020. The Memorial engaged International Conservation Services Pty Ltd to prepare a Heritage Impact Statement (HIS) for this work, and decided on the basis of the HIS to undertake a self-assessment rather than a full referral under the *EPBC Act*. The Memorial assessed that on the basis of the HIS the work was low impact and therefore a full referral was not required.

A consideration of proceeding with the car park works ahead of Project approval was that additional car parking on site was an asset that had been planned by the Memorial and this was likely to be undertaken in the future irrespective of whether the Project proceeded. The increase in car parking

requirement is primarily due to insufficient parking available during peak school holiday periods. The Memorial provided more than 50% of the capital cost from outside Project funds, and secured Medium Works Approval from the Public Works Committee for the works.

The roof of the car park has been designed to support 1.5 metres of soil, which is sufficient to grow mature eucalypts. The Memorial's intent, which has been included as a condition of approval by the National Capital Authority, is to vegetate the roof of the car park consistent with the remainder of the Eastern Precinct – eucalypt over grassland as a connection to Mount Ainslie. The Memorial considers this is consistent with the current landscape setting, however is a significant improvement, as prior to the construction of the Poppy's Café Carpark Extension there was a large vertical drop and a service road to the east of Poppy's Café separating the Café from the landscaped area.

The new design will provide a direct link from Poppy's Café to the landscaped area

9 RESPONSE TO SUBMISSIONS

Section 9 of the Memorial's responses to the public submissions received has been structured to align with the sections of the July Preliminary Documentation (PD) Submission. Where a submission/s raises an issue not identified in the PD, it is noted as an additional impact for consideration and mitigation in this report. The key themes by submission data is attached at [Appendix A](#) of this RtPS report.

9.1 Section 3 of Preliminary Documentation - Need for the Project

The Memorial notes that the need for the project is being formally assessed by the Parliamentary Works Committee rather than through the *EPBC Act* process. Notwithstanding many public comments received included strong opinions on these matters and the Memorial includes the comments, and its responses accordingly.

SUBMISSION(S)	PD	THEME	ISSUE SUMMARY	RESPONSE SUMMARY
143	S3.1	Compliance with the <i>Australian War Memorial Act 1980</i>	One submission contests the Memorial's interpretation of the <i>Australian War Memorial Act 1980</i> and rejects the Memorial's description of the need to tell stories of modern service on an equitable basis under the <i>Australian War Memorial Act 1980</i> .	The Memorial's interpretation is consistent with the <i>Australian War Memorial Act 1980</i> and its history of recognising the sacrifices of all who have served in the uniform of our nation.

Community Breakdown

Community Interest Groups (1)

Commitments:

- Nil

Changes:

- Nil

041; 044; 056; 072; 077; 079; 081; 082; 088; 089; 095; 097; 104; 105; 106; 108; 109; 112; 115; 116; 119; 120; 122; 124; 125; 128; 129; 130; 131; 133; 136; 137; 140; 145; 146; 150; 152; 153; 154; 155; 157; 159; 160; 161; 164; 166	S3.3	Lack of capacity to recognise all conflicts and operations recognised and/or supported	<p>46 submissions highlighted the need for the Memorial to better recognise contemporary conflicts, peacekeeping and humanitarian operations through greater representation within its galleries and exhibitions.</p> <p>Those recognising this need included both submitters that were generally supportive of the project and others that were critical of some or all elements.</p>	<p>The Memorial notes that there was strong recognition of this need across all sectors of the community.</p> <p>This is demonstrated by the fact that this was the most commonly raised theme across all public comments received.</p> <p>It is particularly noteworthy that the majority of veterans who made public comment recognised this need in particular and spoke to how important it was to them that contemporary service was recognised at the Memorial in a manner consistent with previous generations.</p>
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Community Breakdown

Supportive: Veterans Community(27), General Public (10), Descendant (1), Architectural Community (1), Contemporary Defence Family (1), Non supportive: General Public (1), Descendant (2), Architectural Community (2), Government (1),

Commitments:

- **Section 7.6.5.2 Commitment 5B – Future Galleries Content - Community Engagement**

The Memorial will ensure high levels of community input into future exhibition content development to meet community needs and expectations. Social heritage values will underpin exhibition development with input from key audience groups, including veterans and their descendants. This will be achieved through the strategies being developed through the project's Stakeholder and Community Engagement framework.

Changes:

- **Section 7.2 Change to Attachments** Refer to [Attachment S5](#) Stakeholder Engagement Plan of the FPD
- **Section 7.3.4** Updated information and reference to [Attachment E1](#) of the FPD

006; 015; 016; 018; 059; 067; 069; 078; 080; 103; 111; 114; 143; 147	S3.3	Lack of capacity to recognise all conflicts and operations not demonstrated sufficiently or not agreed	14 submissions disputed the Memorial's explanation of the need for additional space or requested additional demonstration of the need.	The Memorial has demonstrated the need for additional space to government through the Two Stage Capital Works Process; its approach is currently being assessed by the PWC.
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Community Breakdown

General Public (9), Descendants (3), Architectural Community (1), Community Interest Groups (1).

Commitments:

- Nil

Changes:

- **Section 7.2 Change to Attachments** Refer to [Attachment E](#) Need for the Project of the FPD
- **Section 7.3.4** Updated information and reference to [Attachment E1](#) of the FPD with additional examples of a lack of capacity to recognise all conflicts and operations including examples of untold stories and detail on current spatial allocations have been provided.

068; 074; 076; 105; 120; 122; 125; 144; 146; 157; 161	S3.4	Lack of capacity to tell the diverse context of war recognised and/or supported	11 submissions recognised or agreed with the need to better recognise the diverse context and impacts of war through greater representation within its galleries and exhibitions.	<p>The Memorial recognises this need as outlined in the Preliminary Documentation and, through project delivery, will meet it both in the immediate and long term future.</p> <p>Gallery content development will include a strong emphasis on engaging the community, especially those affected by these broader contexts including diaspora communities, civilian peacekeepers and diplomats for whom this has special association to meet their needs and expectations.</p>
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Community Breakdown

Veteran Community (4), General Public (3), Descendant (2) Community Interest Groups (1), Architectural Community (1)

Commitments:

- **Section 7.6.5.2 Commitment 5B – Future Galleries Content - Community Engagement**

The Memorial will ensure high levels of community input into future exhibition content development to meet community needs and expectations. Social heritage values will underpin exhibition development with input from key audience groups, including veterans and their descendants. This will be achieved through the strategies being developed through the project's Stakeholder and Community Engagement framework.

Changes:

- **Section 7.2 Change to Attachments** Refer to [Attachment E](#) Need for the Project of the FPD
 - **Section 7.3.5** Updated information and reference to [Attachment E2](#) of the FPD with additional examples of the need and capacity to explore the diverse context and impacts of war provided
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009; 066; 111; 144	S3.4	Lack of capacity to tell the diverse context of war not demonstrated sufficiently or not agreed	Four submissions disputed the Memorial's explanation of the need for additional space on this basis, requested additional demonstration of the need or disputed the Memorial's willingness or ability to explore this complex area of history.	The Memorial has a strong record of delivering stories of the context and costs of war through both its permanent and temporary exhibitions. It will continue to do so in its new galleries and demonstrates how through its Gallery Masterplan.
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Community Breakdown

General Public (2), Veterans Community (1), Community Interest Groups (1)

Commitments:

- **Section 7.6.5.2 Commitment 5B – Future Galleries Content - Community Engagement**

The Memorial will ensure high levels of community input into future exhibition content development to meet community needs and expectations. Social heritage values will underpin exhibition development with input from key audience groups, including veterans and their descendants. This will be achieved through the strategies being developed through the project's Stakeholder and Community Engagement framework.

Changes:

- **Section 7.2 Change to Attachments** Refer to [Attachment S5](#) Stakeholder Engagement Plan and [Attachment E](#) Need for the Project of the FPD
- **Section 7.3.5** Updated information and reference to [Attachment E2](#) of the FPD with additional examples of the need and capacity to explore the diverse context and impacts of war provided. [Attachment E3](#) Gallery Masterplan provided

041; 072; 087; 092; 095; 097; 125; 135; 140; 146; 162	S3.5	Lack of circulation space and impact on visitor safety and comfort recognised and/or supported	11 submissions recognised the need for additional circulation space to provide an appropriate visitor experience including veterans and their families.	The Memorial recognises this need as outlined in the Preliminary Documentation and, through project delivery, will meet it both in the immediate and long term future.
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Community Breakdown

Veterans Community (7), General Public (2), Architectural Community (1), Descendant (1)

Commitments:

- Nil

Changes:

- **Section 7.2 Change to Attachments** Refer to [Attachment E](#) of the FPD with additional detail on how circulation space will be improved provided through [Attachment E3](#) Gallery Masterplan and [Attachment E4](#) Current and Proposed Circulation Comparison.

009; 127	S3.5	Lack of circulation space and impact on visitor safety and comfort not demonstrated sufficiently or not agreed	Two submissions disputed the Memorial's explanation of the need for additional circulation space or requested additional demonstration of the need.	Circulation space is a critical element of museum design and facilitates the visitor experience, security, collection conservation and management, cleaning and more.
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Community Breakdown

Community Interest Group (1), Veterans Community (1)

Commitments:

- Nil

Changes:

- **Section 7.2 Change to Attachments** Refer to [Attachment E](#) of the FPD with additional detail on how circulation space will be improved provided through [Attachment E3](#) Gallery Masterplan and [E4](#) Current and Proposed Circulation Comparison.

122; 125; 135; 137	S3.6	Lack of Accessibility Code Compliance recognised and/or supported	Four submissions recognised or highlighted the need for the Memorial to improve accessibility access across the site.	The Memorial will deliver better accessibility and inclusivity outcomes for all its visitors, noting that many veterans themselves require additional considerations for both physical and social accessibility reasons, through delivery of this project.
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Community Breakdown

Architectural Community (2), Veterans Community (1), Descendant (1)

Commitments:

- **Section 7.6.5.3 Commitment 5C – Future Galleries Content - Universal Access and Inclusion Peer Group**

The Memorial will implement a Universal Access and Inclusion Peer Review Group as part of its Stakeholder and Community Engagement Management Plan. This group will be inclusive and representative of peoples with diverse needs and those who care for them. Opportunities for review and feedback on exhibition design documentation during the concept and developed design stages have been mapped. This Peer Review group will focus on universal access and inclusion, ensuring that the project meets best practice benchmarks and delivers against audience needs.

Changes:

- **Section 7.2 Change to Attachments** Refer to [Attachment S5](#) Stakeholder Engagement Plan of the FPD.

127	S3.6	Lack of Accessibility Code Compliance issues are overblown	One submission contended that the Memorial's <i>Disability Discrimination Act 1992</i> Code Compliance issues are overblown and are being used as a means for uncontrolled changes to a heritage building.	One in five Australians lives with a disability. Accessibility is not simply about meeting requirements for physical access but about delivering an experience for visitors with a disability equal to that offered to those without a disability with dignity and independence. This very real need will be met by the project to enable all Australians to access their Memorial.
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Community Breakdown

Community Interest Groups (1)

Commitments:

- **Section 7.6.5.3 Commitment 5C – Future Galleries Content - Universal Access and Inclusion Peer Group**

The Memorial will implement a Universal Access and Inclusion Peer Review Group as part of its Stakeholder and Community Engagement Management Plan. This group will be inclusive and representative of peoples with diverse needs and those who care for them. Opportunities for review and feedback on exhibition design documentation during the concept and developed design stages have been mapped. This Peer Review group will focus on universal access and inclusion, ensuring that the project meets best practice benchmarks and delivers against audience needs.

Changes: :

- **Section 7.2 Change to Attachments** Refer to [Attachment S5](#) Stakeholder Engagement Plan of the FPD.
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9.1.1 *Compliance with the Australian War Memorial Act 1980*

Issue

One submission contests the Memorial's interpretation of the *Australian War Memorial Act 1980* and rejects the Memorial's description of the need to tell stories of modern service on an equitable basis under the *Australian War Memorial Act 1980*. The submission contends that the need for equitable representation is not present in the *Australian War Memorial Act 1980* and that rather it is an artefact of the Memorial's corporate planning.

Memorial's Response

Under the *Australian War Memorial Act 1980*, the Council of the Australian War Memorial (the Council) is "responsible for the conduct and control of the affairs of the Memorial and the policy of the Memorial with respect to any matters shall be determined by the Council".¹ The Memorial's functions under the *Australian War Memorial Act 1980* also clearly include the development and maintenance of a national collection of the history of the Defence Force, and to exhibit or make available for exhibition by others, the history of the Defence Force.²

It is within the remit of Council to determine that there is a requirement for equitable representation of modern conflicts at the Memorial.

The Memorial continues to treat the service and sacrifice of all who have served in war or on operations without discrimination. This is best demonstrated on the Memorial's Roll of Honour in which all are equal – no ranks are given, there is no mention of awards or decorations and no death in defence of the nation is marked as being more worthy than any other.

The project will ensure that this representation extends beyond the Memorial's role as a shrine to its two other roles: museum and archive. Through the project, the new Bean Building Research Centre will allow the Memorial to receive, examine and make available an influx of digital records from Defence relating to modern service (and help make other records more accessible, both physically and digitally). New gallery spaces will allow the stories of more than 100,000 modern veterans to be told.

Representation on an equitable basis does not and is not intended to translate into a calculation that implies that each conflict or operation (or even each individual soldier, sailor or airman or airwoman) should be given an equal amount of exhibition space or treatment. Rather, the Memorial should acknowledge all service in a fair and appropriate way, taking into account the complexities of each conflict, operation and peacetime service. Under the *Australian War Memorial Act 1980*, this will remain for the judgement of the Council.

Following similar claims through the public comment process of the PWC inquiry into the project, the Memorial consulted with legal advisers at the Department of Veterans' Affairs (DVA) to confirm that its interpretation of the *Australian War Memorial Act 1980* is reasonable and that Council has authority to advance the project and received informal advice to that effect in July 2020.

¹ *Australian War Memorial Act*, subsection 9(2)

Commitment

Nil

Changes to Preliminary Documentation

Nil

9.1.2 Lack of capacity to recognise all Conflicts and Operations recognised and/or supported

Issue

46 submissions recognised the need for the Memorial to better recognise contemporary conflicts, peacekeeping and humanitarian operations through additional galleries and exhibitions.

The strong understanding of, and agreement to this need is demonstrated by the fact that this was the most frequently expressed comment across all public submissions.

Those recognising this need included many that were generally supportive of the project and others that were critical of some or all elements of the proposed development.

Memorial's Response

The Memorial notes that there was strong recognition of this need across all sectors of the community. It is particularly noteworthy that the majority of veterans who made public comment recognised this need in particular and spoke to how important it was to them that contemporary service was recognised at the Memorial in a manner consistent with previous generations.

This need was spoken to eloquently by a number of veterans but was best summed up by one veteran in their own words:

*"For me, the Proposed Development Australian War Memorial provides an equitable and needed opportunity for the diverse and valuable stories of veterans and military service to be recorded and commemorated. My story and sacrifice is one of countless and is a humble contribution to our social heritage and our understanding of military servitude. The true value of my story and sacrifice is that it belongs to, and enriched by a much broader collective and a much older lineage that cannot truly be understood, recognised nor respected if not comprehensively represented through an expanded and diverse legacy"*³

The need for families, especially those of the fallen of these recent conflicts, also speak to the need to better tell these stories,

*"To our minds the exhibition areas do not adequately serve the post-1945 conflicts as well as they should and in particular we believe that the East Timor and Afghanistan displays do not do justice to the many who served in those operational areas. We speak most personally about our son who served in both, indeed was killed [in] Afghanistan], and surely deserves more than a small ad hoc exhibition on the thoroughfare to the research centre. Our journey through grief at his loss has required more than the current displays provide"*⁴

³ Submission 146, Veterans Community

⁴ Submission 095, Veterans Community

The Memorial recognises these needs as outlined in the Preliminary Documentation and, through project delivery, will meet them both in the immediate and long term future through the delivery of additional gallery space, support spaces and improved visitor experiences – including dedicated spaces for veterans and families to reflect on the costs of service in quiet.

Commitment

Section 7.6.5.2 Commitment 5B – Future Galleries Content - Community Engagement

The Memorial will ensure high levels of community input into future exhibition content development to meet community needs and expectations. Social heritage values will underpin exhibition development with input from key audience groups, including veterans and their descendants. This will be achieved through the strategies being developed through the project's Stakeholder and Community Engagement framework.

Changes to Preliminary Documentation

Section 7.2 Change to Attachments - refer to Attachment S5 Stakeholder Engagement Plan of the FPD

Section 7.3.4 Updated information and reference to Attachment E1 of the FPD

9.1.3 *Lack of capacity to recognise all Conflicts and Operations not demonstrated sufficiently or not agreed*

Issue

14 submissions challenged the claim that additional space was needed to better recognise current conflicts on a number of ground; these have been categorised into four sub-issues:

- a. No museum can display everything at once; as such hard choices must be made about priorities to work within existing spaces, a number of submissions relating to this simply stated “you have enough space” or similar;
- b. A small number of submissions in this category stated the opinion that the Memorial already adequately recognised or told stories of contemporary service and no additional space was required to do so;
- c. Modern conflicts and peacekeeping have not had the same national impact as other conflicts, i.e. the World Wars, and as such don't require as much space to be recognised properly; and
- d. Lack of demonstration of the need for more space, with particular reference to July 2020 *Preliminary Documentation Attachment D* being insufficient and/or a lack of data proving current displays are inadequate.

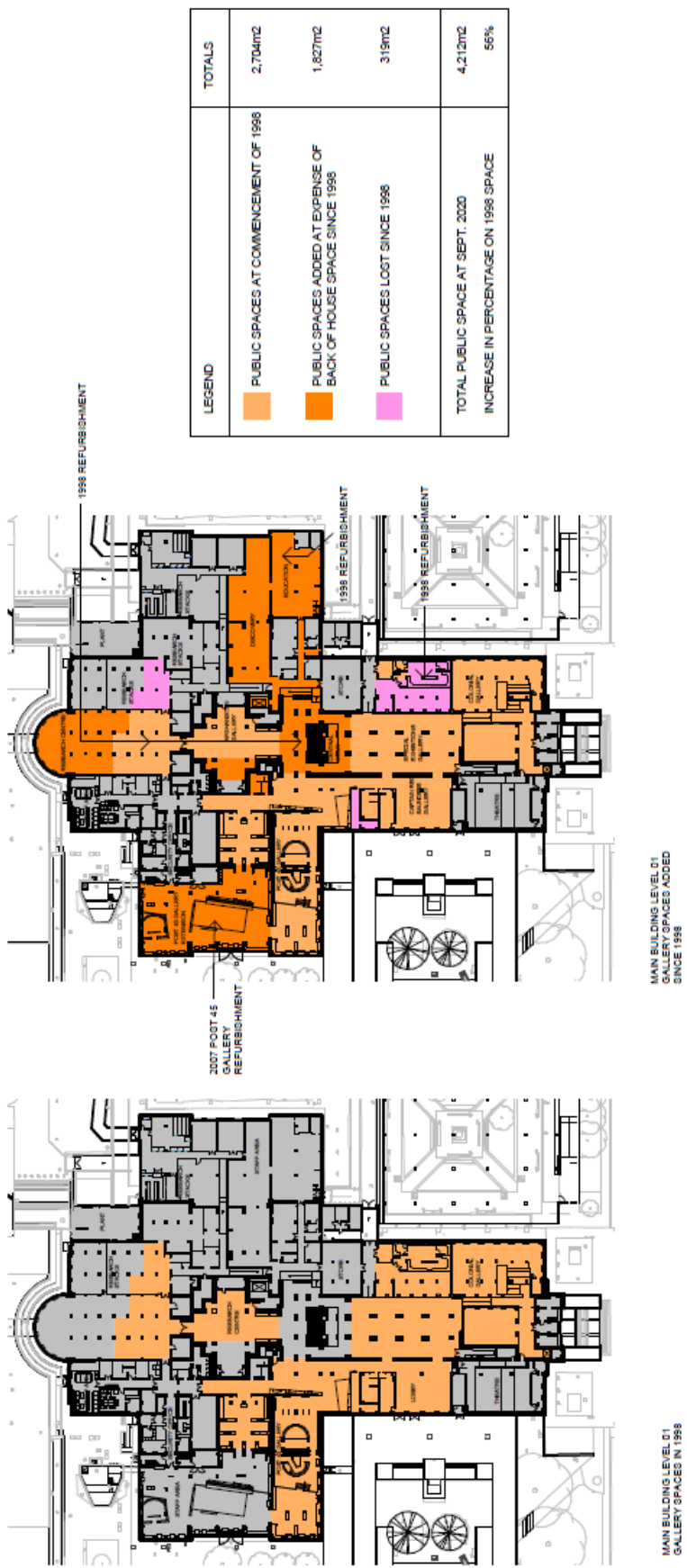
Memorial's Response

The Memorial has demonstrated the need for more space to the government through an extensive and considered process to secure funding for the project. This Two Stage Capital Works Process, including both an Initial Business Case and a Detailed Business Case, demonstrated the need for a generational investment in the Memorial to secure its long term future as the centre for national commemoration.

- a. The Memorial agrees that making hard choices about what to display is part of good management for any museum. The Memorial has made a number of hard choices in recent years and has re-purposed an additional 1,553m² of circulation and back of house space for exhibitions on Level 1 of the Main Building since 1998.

Major changes include repurposing the family research area of the Research Centre to support a modest display on the service of Australians in Afghanistan or the reclamation of circulation space to support other post-1945 conflict displays.

The plan below shows these changes, demonstrating that today there is a total of 4,212m² of public space on this level compared to 2,704m² less than 25 years ago — a 56% increase — and that there is little space left to re-purpose for galleries.



GROWTH OF MAIN BUILDING LEVEL 01 PUBLIC SPACE SINCE 1998



AWM-0000 -SD-PM -0313 [01]
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These choices have had a number of impacts on matters such as exhibition design and flexibility, circulation and reflection space for visitors, reduced operational efficiencies and additional operating costs due to the need to compromise between these matters and the allocation of exhibition space. Further piecemeal additions to displays through further repurposing space in the Main Memorial Building are not sufficient as a long term solution to enable the Memorial to tell stories of contemporary and future veterans.

If the Memorial is to continue to meet its obligations under the *Australian War Memorial Act 1980*, and public, government and veteran expectations of how it does so, there is a clear need for additional space at the Memorial to recognise recent conflicts and operations. It is also important that such recognition is delivered with equal dignity and respect to those who served in conflicts such as the First or Second World Wars and whose stories will continue to be told to a world class standard at the Memorial.

- b. The Memorial strongly disagrees with the position of these submissions and notes that of the 43 veterans who made submissions this was not a view expressed by any, including the four who were generally not supportive of the project.
- c. The Memorial contends that the very fact that recent conflicts have not had the same national profile, recognition and indeed public impact is a compelling reason they need to be better represented at the Memorial. The changing nature of Australia's experience of conflict in the 20th Century, from national efforts in world wars, in which almost every Australian was impacted, to contemporary service where the burden of our nation's security is borne by a much smaller portion of the population is a critical driver for this project.

The importance of the Memorial's educative role, particularly for members of the Australian community with no direct association with Australian military history, was underlined by the Honourable Robert Ellicott in his capacity as the Minister for Home Affairs and Minister for Capital Territory in his second reading of the *Australian War Memorial Bill 1980* (emphasis added):

*For a number of years, the Memorial has been concerned to depict not only conflicts in which Australians have been engaged, but also the events leading up to conflict in all sections of the community. **It has been increasingly important to explain the reasons underlying Australia's involvement in war and war-like activities as the changing population base in Australia has resulted in the majority of Australians having no direct association with our military history.** It is a proud history and while we do not set out to glorify warfare, we do have a responsibility to explain Australia's role in it — particularly to the younger generations and to those Australians who have recently migrated to this land and made it their own. For this reason, the Bill provides specifically for the educational responsibilities of the Memorial ...*

This role is more important than ever given that those with no direct association with our modern military history now include a vast majority of Australians. Educating these Australians to the service and sacrifice of those who have served over the past 35 or more years is a critical element in the Memorial maintaining its current levels of social heritage significance, relevance and helping the country meet its obligation to its veterans – We will remember them.

- d. Approximately 4% of the Memorial's current permanent exhibition space of approximately 10,000m² is allocated to recent conflicts in which 35,000 Australians have served – many multiple times, in some cases on as many as eight deployments.
- e. More than 70 years of peacekeeping, stability and humanitarian operations and the efforts of more than 60,000 Australians to make the world a safer place for us and other peoples are represented in an even smaller amount of space.

The table below outlines the space currently allocated to the stories of more than 100,000 Australian veterans and those, like the Australian Federal Police, civil service and non-government organisations who have supported them:

CONFLICT	EXISTING SPACE (APPROX. m ²)
First Gulf War	75m ²
Afghanistan	275m ²
East Timor	40m ²
Second Gulf War (2003)	40m ²
Peacekeeping	100m ²
Humanitarian Operations	0m ²

This is an inadequate allocation of space to tell these stories and their impact on the broader Australian community in a meaningful or respectful manner.

Similarly, with less than 400m² of space identified in the current Main Building layout as possible future galleries it is clear that this would be neither adequate for representation of recent conflicts nor peacekeeping efforts, nor a sustainable strategy to meet the Memorial's long-term needs. Additionally these spaces, like many of those re-purposed in recent decades, are likely to deliver compromised exhibition spaces that do not meet best practice or the Memorial's requirements.

The need for expansion, made clear to and supported by government through the Two Stage Capital Works Process, is clear.

Commitment

Nil

Changes to Preliminary Documentation

Section 7.2 Change to Attachments - Refer to [Attachment E](#) Need for the Project of the FPD.

Section 7.3.4 Updated information and reference to [Attachment E1](#) of the FPD with additional examples of a lack of capacity to recognise all conflicts and operations including examples of untold stories and detail on current spatial allocations have been provided.

9.1.4 *Lack of capacity exhibit the broader context of war recognised and/or supported*

Issue

11 submissions recognised or highlighted the need for the Memorial to better explain the diverse context of war, including how and why we go to war, how we try to avoid war and the impacts on soldiers, civilians and nations of the wars or peacekeeping operations we have been involved in.

Those recognising this need included both many that were generally supportive of the project and others that were critical of some or all elements of the proposed development.

A number of these submissions provided specific suggestions on future content for the Memorial's galleries including the need to explore peace activism, the experience of refugees from war-torn countries who have since become Australians (including in countries Australia hasn't had an Australian Defence Force (ADF) presence in), diplomacy, non-ADF peacekeeping efforts and more.

The Memorial notes that there was a strong call from a number of Australian Federal Police (AFP) peacekeeping or peacemaking veterans to see their stories told in the context of the Memorial in particular.

Memorial's Response

The Memorial notes that there was strong recognition of this need across a number of sectors of the community, and that the *Australian War Memorial Act 1980* identifies the need for the Memorial to include exploration of events leading up to, and the aftermath of such wars and war like operations.

The Memorial recognises this need as outlined in the Preliminary Documentation and, through project delivery, will meet it both in the immediate and long term. Gallery content development will include a strong emphasis on engaging the community, especially those affected by these broader contexts including diaspora communities, civilian peacekeepers and diplomats for whom this has special association to meet society's needs and expectations.

Commitments

Section 7.6.5.2 Commitment 5B – Future Galleries Content - Community Engagement

The Memorial will ensure high levels of community input into future exhibition content development to meet community needs and expectations. Social heritage values will underpin exhibition development with input from key audience groups, including veterans and their descendants. This will be achieved through the strategies being developed through the project's Stakeholder and Community Engagement framework.

Changes to Preliminary Documentation

Section 7.2 Change to Attachments Refer to [Attachment E](#) Need for the Project of the FPD

Section 7.3.5 Updated information and reference to [Attachment E2](#) of the FPD with additional examples of the need and capacity to explore the diverse context and impacts of war provided

9.1.5 *Lack of capacity to explain diverse context of war not demonstrated sufficiently or not agreed*

Issue

Four submissions challenged the Memorial's capacity, willingness or capability to explore the diverse context of war and its impact on Australian society with the following specific issues:

- a. One submission asserts that the need to describe a broader description of war is not part of the Memorial's role;
- b. Concern that the peacekeeping, peacemaking or efforts of Australians outside the ADF to prevent war or that more broadly aspects of war beyond the experience of the ADF (i.e. stories of civilians, those who oppose war or explanations of how we got involved) are currently marginalised at the Memorial and will continue to be so; and
- c. Lack of demonstration of the need to explore the diverse experience of Australians at war, with particular reference to this not being the Memorial's role or Preliminary Documentation Attachment D (note from July 2020 submission) being insufficient and/or a lack of data proving current displays are inadequate to meet this need.

Memorial's Response

- a. The Memorial's role as custodian of the nation's military history is defined in the *Australian War Memorial Act 1980* as including the events leading up to, and the aftermath of wars and other operations, the broader description of war reflects this part of the *Australian War Memorial Act 1980* accurately. Additionally as the concerns expressed in a number of other submissions on this matter demonstrate there is a strong community expectation that the Memorial will explore issues beyond just battlefield actions within its research, publications, displays and other public programs.
- b. The Memorial acknowledges it has not always achieved this goal to the satisfaction of every visitor, as demonstrated by several of these comments. Despite this, visitor satisfaction with the Memorial's permanent and special exhibition program is, by and large, very high and, in conjunction with a number of highly regarded recent temporary exhibitions exploring these themes, demonstrates its capacity to tackle these issues.⁵

The Memorial notes there is no specific allocation of current gallery space within the Memorial for these themes; instead these stories are embedded in each and every gallery. The overall lack of space to explore recent conflicts and peacekeeping however further constrains the Memorial's ability to explore these themes in the small areas allocated to these operations and Australians' experience of them.

Additional space will allow the Memorial to increase not only the amount of space dedicated to stories showing the diverse context of war but also to explore issues such as how we try to avoid conflict in the first place through diplomacy or regional support.

⁵ Ninety six per cent of visitors said they included a permanent gallery as part of their visit. One hundred per cent of these visitors said they were satisfied with the permanent exhibitions, 87% were very satisfied. (Source: Australian War Memorial Annual Report 2019-20)

The Memorial has explored these themes in recent years through some of its major special exhibitions including *After the War* and *The Courage for Peace* in 2018–20. These exhibitions demonstrate the Memorial’s capacity and intent to explore these critical issues and to meet the need, under the *Australian War Memorial Act 1980*, to record, research and disseminate information not just on war or combat, but also the events leading up to, and the aftermath of, such operations.

- c. The need to include more stories like this in our permanent galleries, especially in relation to modern conflicts and peacemaking/peacekeeping operations is further demonstrated by the response to these exhibitions.

More than 90% of exit survey respondents for *After the War* said it had given them a better understanding of the impacts of war on those who have served and 89% that it gave them a better understanding of the Australian experience of war.

The Courage for Peace exit survey revealed similar reactions – 92% of respondents left with a better understanding of peacekeeping and the impacts it has on those, including ADF, AFP and civilians, who perform it.

Enhancing the understanding of Australians visiting the Memorial of these issues in the way these temporary exhibitions have through new permanent exhibitions is critical to the Memorial delivering the social value of it expected by the community.

Commitments

Section 7.6.5.2 Commitment 5B – Future Galleries Content - Community Engagement

The Memorial will ensure high levels of community input into future exhibition content development to meet community needs and expectations. Social heritage values will underpin exhibition development with input from key audience groups, including veterans and their descendants. This will be achieved through the strategies being developed through the project’s Stakeholder and Community Engagement framework.

Changes to Preliminary Documentation

Section 7.2 Change to Attachments Refer to [Attachment S5](#) Stakeholder Engagement Plan and [Attachment E](#) Need for the Project of the FPD.

Section 7.3.5 Updated information and reference to [Attachment E2](#) of the FPD with additional examples of the need and capacity to explore the diverse context and impacts of war provided. [Attachment E3](#) Gallery Masterplan provided to FPD.

9.1.6 Lack of Circulation Space recognised and/or supported

Issue

11 submissions, including from the family of one of the 43 Australians killed in Afghanistan remembered on the Roll of Honour, recognised or highlighted the need for the Memorial to improve the allocation and use of circulation space across the site.

This recognition included the need to provide for space for reflection and grieving as well as touching on the project's ability to allow the Memorial to optimise the visitor experience through a more logical placement of gallery spaces in chronological or thematic order, compared to the current more ad-hoc arrangements.

Of these submissions, six submissions largely from veterans, also spoke to the need for dedicated reflection and respite spaces; see *Section 9.12.2 Social Heritage – Inclusion of Withdrawal and Reflection Spaces* of this report for further detail.

Memorial's Response

The Memorial recognises that circulation space is not simply space for people to move around exhibits but rather a critical element of successful museum design. Ensuring that appropriate spaces are available for visitors and staff will deliver better visitor experiences, including for veterans and their families through dedicated space for reflection, and enhance the Memorial's ability to better use spaces through exhibition design, object movement and conservation, and more besides.

The Functional Design Brief included a key outcome related to access and amenity to be addressed, to remediate existing constraints and improve visitor experience:

Access and Amenity: The increase in visitor numbers and the expansion of the exhibition space has in recent years exacerbated existing challenges for visitors to the Memorial. The Memorial in its current form cannot achieve efficient visitor circulation and provide adequate amenities to appropriately accommodate the ever increasing number of visitors.

The brief did not indicate a specific target area to be attained for visitor circulation, but rather required a gallery masterplan — prepared by a suitably qualified consultant — that would address the visitor experience based on expected visitation numbers.

The Gallery Masterplan prepared by Broadcast Museum Design at [Attachment E3](#) of the FPD calls for simplified and rationalized visitor circulation, to create clear and efficient journeys to assist visitor comfort and wayfinding. It directs the establishment of a major central north–south corridor that offers points of orientation, gathering, amenity, rest and contemplation and the connection of levels through improved vertical circulation.

Concept Design has commenced on the Main Building refurbishment with the below considerations regarding circulation, over and above the requirements of the National Construction Code.

- General ease of visitor wayfinding and navigation of a complex site across many levels;
- An architectural solution that responds to heritage and structure where it presents as a constraint;
- Establishment of consistent floor levels at Level 1 and Level 2 with Anzac Hall and the glazed link;
- Southern Entrance – entry and orientation for visitors, primary purpose to deliver visitors into the main heritage building;
- Connection into the building via Level 1 to create a new axial path from southern entrance, through the building and new gallery areas (from reclaimed back of house functions) to the

glazed link and Anzac Hall. Path to diverge around and through the central heart of the Memorial;

- Retention of existing horizontal circulation on Level 2 but re-planning of gallery elements that are diminished by being on the central circulation path;
- New stairs (and existing lift) upon immediate entry to main building to establish an immediate resumption in the experience to the Level 2 commemorative area and to connect with the existing entrance;
- Re-levelling of areas to the east current back of house to allow public circulation around the central heart to new amenities;
- Refocus and treatment of spaces under the dome and tomb of unknown soldier (central heart) as unifying (commemorative / reflection) element across the floors;
- Creating space for designated gathering zones adjacent to education areas and galleries used for curriculum programs, for school groups of up to 30 as well as opportunities for groups of people (15 – 30) to pass each other in the corridor;
- Allow space for movement of large access / cleaning equipment and display content between galleries; and
- Circulation space to provide opportunities for rest and reflection informally along routes. Formal respite spaces are also briefed within the development.

The Memorial will deliver these improved circulation space outcomes through delivery of this project, increasing its efficiency and flexibility and importantly providing public spaces that will be fit for purpose for the next 50–100 years.

Commitments

Nil

Changes to Preliminary Documentation

Section 7.2 Change to Attachments Refer to [Attachment E](#) of the FPD with additional detail on how circulation space will be improved provided through [Attachment E3](#) Gallery Masterplan and [Attachment E4](#) Current and Proposed Circulation Comparison.

9.1.7 *Lack of Circulation Space not demonstrated sufficiently or not agreed*

Issue

Two submissions contended that a lack of circulation space and its attendant impacts on visitor safety and amenity were either not a reason to approve the project or that insufficient detail had been provided, particularly in relation to the Main Building refurbishment to support this need.

Memorial's Response

Circulation can be described in simplest terms as how various spaces, functions or activities are connected across a building or precinct, and how visitors move in, through and between them. It is critical to the function of any public space, but particularly to museums.

Circulation through the Memorial determines what visitors will see, where they will focus their attention, what they will learn and experience, and how they will bring that understanding to better commemorate those remembered at the Memorial.

The availability, or lack thereof, of private or quiet spaces for some veterans to reflect on their service can be critical to their experience of the Memorial. A crowd of people near a display or a choke point in a corridor may deter visitors from seeing exploring an area or viewing and exhibition. The availability of suitable spaces for school groups to pause on a tour for interactive learning without disruption can determine the educational value of a trip to the Memorial for some students and teachers.

How visitors circulate determines, beyond these important visitor outcomes, a variety of other matters, including the security of people and collections, safety in the event of an emergency or slips, trips and falls, and the use of visitor amenities such as bathrooms, cafes or research facilities. It also has implications for maintenance and staffing, and how the Memorial programs tours, timed audio visual displays and more.

Circulation space has critical impacts on issues such as cleaning, object conservation or exhibition changeovers, especially for valuable, delicate or larger objects or artworks.

Properly considering these variables is critical to ensuring that the Memorial is fit for purpose. This is not currently the case in many areas, including the Tarin Kowt Wall for veterans – which is placed in a corridor adjacent public bathrooms, with little room for veterans to undertake personal reflection or private grieving — and the little-visited lower level of Anzac Hall.

The lower level of Anzac Hall is a demonstration of how circulation design can affect the learning or commemorative experience of a visitor. Access to the lower level of Anzac Hall occurs via a small lift or stairs from the mezzanine level, both of which are off the main line of visitor circulation and outside the view lines of major object attractors in the space. Due to these limitations less than a third of visitors to Anzac Hall make it to the lower ground floor level to explore important exhibitions such as the 1942 Milne Bay display, which describes one of the most important parts of the battle for Australia, or to see the small artefacts and personal stories linked to the famous Lancaster “G for George”.⁶

Circulation space has become an even more critical issue for public spaces since the COVID-19 pandemic. Visitation numbers and length of visit at the Memorial are currently further constrained than regulations require in a number of areas due to a lack of circulation spaces to ensure visitor groups do not come into contact.

The Memorial notes again that this need has been demonstrated to, and agreed upon by, government through a Two Stage Capital Works Approval process.

Commitments

Nil

Changes to Preliminary Documentation

Section 7.2 Change to Attachments Refer to Attachment E of the FPD with additional detail on how circulation space will be improved provided through Attachment E3 Gallery Masterplan and Attachment E4 Current and Proposed Circulation Comparison.

⁶ Australian War Memorial General Visitor Survey analysis 2018–19

9.1.8 *Lack of Accessibility Code Compliance recognised and/or supported*

Issue

Four submissions recognised or highlighted the need for the Memorial to improve accessibility access across the site; this included one AFP peacekeeping veteran who stated,

I, a disabled veteran of numerous conflicts believe that the whole Australian War Memorial should not only be accessible to us, but accessible in a dignified manner, which I believe the expansion will enable.⁷

Other public comments on this issue supported the use of natural light in indoor spaces and included the proposed reflection spaces for veterans and families within their praise for accessibility measures at the Memorial.

Memorial's Response

The Memorial understands the historical and cultural importance of an iconic national monument, and its underlying heritage significance. The design applies practical and creative solutions in an attempt to maximise accessibility features while minimising heritage impact with the core objective of achieving a balanced and practicable outcome.

Philip Chun Building Compliance Pty Ltd has been engaged as the access consultant for the Project to provide expert advice on these matters.

Many of the heritage significant buildings on the Memorial Grounds were designed and constructed prior to enactment of legislation relating to accessibility for persons with disabilities.

The following are minimum benchmarks for compliance:

- National Construction Code — Building Code of Australia;
- *Disability Discrimination Act 1992*;
- Disability (Access to Premises) Standards 2010; and
- Relevant Australian Standards including as a minimum AS1428.1.

The Memorial recognises that accessibility is not simply about meeting requirements for physical access but is about delivering an experience for visitors with a disability equal to that offered to those without a disability.

Through delivery of this project the Memorial will deliver better accessibility and inclusivity outcomes for all visitors, noting that many veterans require additional considerations for physical and social accessibility.

Commitment

Section 7.6.5.3 Commitment 5C – Future Galleries Content - Universal Access and Inclusion Peer Group

The Memorial will implement a Universal Access and Inclusion Peer Review Group as part of its Stakeholder and Community Engagement Management Plan. This group will be inclusive and

⁷ Submission 122, Veterans Community

representative of peoples with diverse needs and those who care for them. Opportunities for review and feedback on exhibition design documentation during the concept and developed design stages have been mapped. This Peer Review group will focus on universal access and inclusion, ensuring that the project meets best practice benchmarks and delivers against audience needs.

Changes to Preliminary Documentation

Section 7.2 Change to Attachments Refer to Attachment S5 Stakeholder Engagement Plan of the FPD.

9.1.9 *Lack of Accessibility Code Compliance not demonstrated sufficiently or not agreed*

Issue

One submission contended that the Memorial's claims that accessibility improvement was a compelling reason for undertaking the project were overblown and being used as a means for uncontrolled development of a heritage building.

Memorial's Response

Accessibility is about more than physical access infrastructure such as ramps or lifts – less than 20% of Australians with a disability use a mobility aid of any kind and only 4% a wheelchair. Other factors to be taken into account include accessible bathrooms at reasonable intervals, spaces that can be traversed with dignity by those with a variety of physical conditions, exhibitions that are accessible in a variety of methods and the broader concept of social accessibility – creating a visitor experience that is equally accessible by all with independence and dignity.

This claim also fails to recognise the scale of the challenge presented in delivering an inclusive facility. The Australian Institute of Health and Welfare notes that 18% of the population, more than four million Australians, have a disability; one in three have a severe or profound disability; and one in a five have a mental or behavioural disability.⁸ One-third of Australians with a permanent disability avoid situations such as going out in public due to their disability.⁹ Approximately one in three Australians will suffer a temporary disability at some time in their lives. Many Australians without a disability, such as parents with small children or older Australians appreciate and use accessible friendly systems on a day to day basis simply for the convenience or ease of use.

Providing physical and social accessibility, both physical and social, not as an afterthought but as a design component from the outset is vital to ensuring that the Memorial, which is for all Australians, can be visited by all Australians.

Commitment

Section 7.6.5.3 Commitment 5C – Future Galleries Content - Universal Access and Inclusion Peer Group

The Memorial will implement a Universal Access and Inclusion Peer Review Group as part of its Stakeholder and Community Engagement Management Plan. This group will be inclusive and representative of peoples with diverse needs and those who care for them. Opportunities for review

⁸ Australian Institute of Health and Welfare, People with disability in Australia, www.aihw.gov.au/reports/disability/people-with-disability-in-australia/personal-factors/prevalence-of-disability, retrieved 21 August 2020

⁹ Australian Network on Disability, www.and.org.au/pages/disability-statistics.html, retrieved 21 August 2020

and feedback on exhibition design documentation during the concept and developed design stages have been mapped. This Peer Review group will focus on universal access and inclusion, ensuring that the project meets best practice benchmarks and delivers against audience needs.

Changes to Preliminary Documentation

Section 7.2 Change to Attachments Refer to Attachment S5 Stakeholder Engagement Plan of the FPD.

9.2 Section 4 of Preliminary Documentation - Design Development and Selection

A number of documents providing detail on the design development process, primarily the Initial Business Case (IBC), Detailed Business Case (DBC) and their relevant appendices, are 'Cabinet in Confidence' and not available to the public.

SUBMISSION(S)	PD	THEME	ISSUE SUMMARY	RESPONSE SUMMARY
111; 127; 143; 147; 153	S4.2	Design Options - IBC	Five submissions disputed the Memorial had sufficiently demonstrated the rationale behind its IBC based decision to develop options for additional space on the Campbell site.	The Memorial demonstrated the rationale behind the selection of the preferred option for further analysis clearly through its Initial Business Case and supporting New Policy Proposal to government in 2017 including heritage considerations and use of appropriate metrics.

Community Breakdown

Architectural Community (1) Community Interest Groups (2); Descendant Community (1); General Public (1)

Commitments:

- Nil

Changes:

- Nil

032; 036; 057; 059; 061; 078; 080; 085; 111; 112; 156	S4.3	Design Options – Precinct Based Solution	11 submissions referred to a satellite site(s) solution as preferable or inadequately considered by the Memorial.	The Memorial examined the use of satellite facilities, including both at Mitchell and greenfield sites through its Initial Business Case. It did not meet the business needs defined by the Memorial and accepted by government, and indeed was ranked equal last of the options reviewed on a number of grounds.
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Community Breakdown

Community Interest Groups (1); General Public (10)

Commitments:

- Nil

Changes:

- Nil

111; 127; 137; 143; 153; 163	S4	Design Options –Process Concerns	Six submissions expressed concerns around due process or failures of process during the design development and selection process.	The Memorial's proposed designs are based on a detailed Functional Design Brief with clear requirements and outcomes. Independent oversight of the design process has been provided by Interdepartmental committees consisting of SES level representatives from key departments and agencies, including the Departments of Prime Minister and Cabinet, Defence, Veterans' Affairs, Treasury and Finance, and the NCA. Regular reporting to the Minister for Veterans' Affairs and a Memorial Development Committee, with two Independent Industry Experts, which reports to the Memorial Council, has been conducted to ensure that proper processes have been followed.
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Community Breakdown

Architectural Community (2) Community Interest Groups (2); Descendant Community (1); General Public (1)

Commitments:

- Nil

Changes:

- **Section 7.3.7 added new sections 4.4.9 – 4.4.12 JPW Masterplan 2017 to the FPD**
Additional section in response to public comment on whether the Memorial properly considered the JPW Masterplan 2017 during the design development phase.

087; 125; 140; 151	S4	Design Options – Due Process	Four submissions, including two from architects who participated in the design competition process, endorsed the design options process used by the Memorial.	The Memorial's design options process has been robust and conducted in accordance with government procurement best practice.
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Community Breakdown

Architectural Community (2) Veterans Community (2)

Commitments:

- Nil

Changes:

- Nil
-

9.2.1 *Development of Options Stage 1 (Initial Business Case)*

Issue

Five submissions disputed the Memorial had sufficiently demonstrated the rationale behind its IBC based decision to develop options for additional space on the Campbell site. Three main criticisms were laid out in these submissions:

- a. There was insufficient demonstration of the preferred option to undertake construction and refurbishment onsite;
- b. There was a lack of metrics or technical assessment in reaching this conclusion and/or the outcome was predetermined; and
- c. There was little or no reference to the Memorial's *Heritage Management Plan 2011* or heritage matters in general.

Memorial's Response

- a. The Memorial demonstrated the rationale behind the selection of the preferred option for further analysis clearly through its Initial Business Case and supporting New Policy Proposal to government in 2017.
- b. The Memorial's IBC was conducted in accordance with the Commonwealth Property Management Framework. The Memorial's Initial Business Case contained all relevant metrics and technical assessments in accordance with the Commonwealth Property Management Framework.
- c. Appropriate consideration of heritage and environmental impacts of all options has been a key element of the Memorial's assessment of potential project outcomes at all times including through the IBC.

The Memorial's Initial Business Case as presented to government included a dedicated section on environmental and heritage matters including an assessment and summary of the potential impacts on Matters of National Environmental Significance (MNES) or Other Protected Matters under the *EPBC Act*.

It should be noted that in accordance with Department of Finance requirements under the Two Stage Capital Works Approvals Process this is a strategic assessment, subsequent detailed assessments of the heritage and environment impacts of the preferred options was carried out via the DBC.

Commitments

Nil

Change to Preliminary Documentation

Nil

9.2.2 Design Options – Precinct Based Solution

Issue

11 submissions referred to a satellite site(s) solution as preferable or inadequately considered by the Memorial. This criticism was laid out with particular reference to:

- a. A failure to consider or use the Memorial's Treloar Technology Centre at Mitchell; and
- b. The perception that the Memorial's focus was on displaying Large Technology Objects in new galleries, including statements that sites other than Campbell would be more appropriate for such displays.

Memorial's Response

- a. The Memorial examined the use of satellite facilities, including Mitchell and Greenfield sites, through its Initial Business Case. It did not meet the business needs defined by the Memorial and accepted by government, and indeed was ranked equal last of the options reviewed on a number of grounds.

The reviewed option proposed that exhibition space be provided at Mitchell to tell the stories of Australians in conflict, peacekeeping or humanitarian operations through development of approximately 10,500m² of exhibition spaces, plant, and circulation and back of house functions at the Mitchell site. The analysis concluded that:

- i. A dispersed Memorial would result in the exhibitions at Mitchell being separated from the Memorial's commemorative purposes, thereby lessening the importance and relevance of both sites;
- ii. This option would result in reductions to the long-term storage capacity of the Memorial's Mitchell precinct, limiting the ability to grow the National Collection;
- iii. The Mitchell storage and conservation facility is not open on a regular basis and is not able to sustain audiences on a daily basis;
- iv. The Mitchell site is located adjacent the light rail corridor currently under development on Flemington Road. This would support visits from adjacent to the Light Rail corridor;
- v. Use of public transport between the Campbell and Mitchell sites would require two separate bus/tram trips, with a change at the city bus terminal. Based on weekend timetables, a trip between the War Memorial at Campbell and the Mitchell facility would take, on average, 50 minutes. Car travel time is approximately 15–20 minutes;
- vi. This option is inconsistent with Charles Bean's vision for the Memorial as an integrated memorial, museum and archive, as it separates the commemorative function at the Memorial's heart from at least a part of its exhibition program; and
- vii. This option was considered a high risk solution and deemed unviable as a long-term solution.

The claim that a display of LTOs at the Memorial's Mitchell site would serve the same needs as

the Memorial's proposed Campbell site based Project is contrary to the Memorial's tri-partite role as a shrine, museum and an archive, as well as the business need the Memorial demonstrated to government.

The Memorial's Treloar Technology Centre is, like similar centres run by other National Cultural Institutions in the Mitchell area, a storage, workshop and conservation centre and was not designed for regular public access. The image below of the new Treloar E facility completed in 2019 demonstrates that even the most modern facilities on site are not museum grade display sites and do not provide context for the content.



Comparisons with the Imperial War Museum (IWM), the Smithsonian or other museums with satellite sites are not appropriate on the basis that these institutions do not have a commemorative role for their communities in the same manner as the Memorial. They are distinctly, and deliberately, separated from their respective national memorials or their national 'Unknown Soldiers' and serve as museums and archives only.

In order for the Memorial to meet the obligations of Section 5: Functions of the Memorial of the *Australian War Memorial Act 1980* as the national shrine, museum and archive of our military history, it is necessary and appropriate for contemporary stories to be told at the Memorial's Campbell site. They must be located with a clear and strong connection to the heart of the Memorial – the Commemorative Area, including the Hall of Memory and the Tomb of the Unknown Australian Soldier and Rolls of Honour – as are the stories of their forebears. The Memorial's proposed plan does this in a manner that no LTO display or other museum at its Mitchell facility can.

Use of the Mitchell site for exhibition has second order cost effects that need to be considered, including the duplication of operational requirements for visitor services across the Campbell and

Mitchell sites, the need to find additional space and facilities for conservation work, and additional security requirements for the site to operate regularly as a public space, particularly given the large number of (deactivated) firearms stored on site.

- b. The Memorial's Project is not intended to display LTO's in greater number, rather it is intended to address issues that prevent the telling of the stories of recent conflicts and operations at a level of detail consistent with earlier conflicts, and the issues that impede the Memorial properly recognising the service of those who served in recent conflicts and operations.

Comments to the effect that if the Memorial is seeking to build a museum of military or equipment it should do so at Mitchell misunderstand this intent and overemphasise concept images and fly-through videos that display LTO's.

Commitment

Nil

Changes to Preliminary Documentation

Nil

9.2.3 Design Options – Process Concerns

Issue

Six submissions expressed concerns around due process or failures of process during the design development and selection process:

- a. That the outcome of design development was pre-determined and lacked sufficient metrics, relying on simple statements of belief or emotion' and that the process was flawed in general;
- b. That heritage has not been given adequate consideration or weight during the design process or that it was overshadowed by other needs;
- c. That proper examination of prudent alternatives to actions that would cause significant impact under the *EPBC Act* have been insufficiently examined;
- d. That the requirement to adhere to the reference design, specifically the replacement of Anzac Hall with a New Anzac Hall, at the Expression of Interest (EOI) point in the tendering process constrained the design process; and
- e. That perception that the inclusion of the reference design in the design competition process, specifically the replacement of Anzac Hall with a New Anzac Hall, meant that design did not take its lead from the *Heritage Management Plan 2011* and was fixated on the replacement of the existing Anzac Hall.

Memorial's Response

- a. The outcome of design development was not pre-determined, as demonstrated by the evolution of the design from the JPW Masterplan 2017 to the final proposal over a three-year period. This design and its selection was backed by an extensive series of objective and measured assessments as demonstrated to government through delivery of two extensive business cases. Additional

information on consideration of the JPW Masterplan 2017 has been added to the Final Preliminary Documentation.

These business cases resulted in a detailed Functional Design Brief that ensures all design elements are matched with clear requirements and outcomes.

Independent oversight of the DBC was provided by the Interdepartmental Steering Committee and oversight of the project delivery is provided by an Interdepartmental Advisory Committee. These committees consist of SES level representatives from key departments and agencies including the Departments of Prime Minister and Cabinet; Defence; Veterans' Affairs; Treasury and Finance; and the NCA.

The Memorial will undertake regular reporting to the Minister for Veterans' Affairs, and a Memorial Development Committee including two independent industry experts which reports to the Memorial Council to ensure that proper processes are followed.

- b. The Memorial has given heritage considerations appropriate weight at all stages of the design process and has at all times been guided by the heritage management principles laid out in the *Heritage Management Strategy 2019* and the *Heritage Management Plan 2011*.

These processes started with heritage considerations in the IBC, followed by a design multi-criteria assessment of the four options referred from the IBC with an emphasis on heritage matters during the development of the DBC.

This assessment examined some 57 criteria across three key areas — technical, financial and project objectives. Fifty criteria were weighted and scored, while seven were non-scoring. Heritage and environment was the only matter considered across multiple areas (technical, project objectives), consisting of ten key scored heritage criteria — 20% of the criteria considered — including matters under both EPBC and NCA jurisdiction.

This fed directly into the reference design, which arose from the DBC and informed the Design Competition process. As a result, a key design outcome requirement from the Expression of Interest (EOI) stage was to “comply with the heritage guidelines and any conditions that arise from the *EPBC Act* Referral process, and look for opportunities to improve the Memorial’s Heritage outcomes”.¹⁰

Critically, each EOI was scored on three key considerations, the first of which was to “experience with producing functional, innovative and visually appealing design outcomes for high profile cultural institutions, including with a heritage overlay”.¹¹

During the design competition process, ‘heritage’ was one of the key assessment criteria used by the Design Competition Jury for Design Packages 3 and 4. While it was given equal weighting with the other criteria, it was recognised that a poor heritage outcome would effectively veto a design even if it scored highly in other areas.

¹⁰ Australian War Memorial Architect EOI Attachment A Project and Scope Brief, February 2019

¹¹ Ibid

The Design Jury was supported by a panel of technical advisers consistent with the Australian Institute of Architects Architectural Competition Guidelines (best practice guidelines established by the AIA), including a professional adviser (a registered architect), a probity adviser, quantity surveyor, expert museum staff from the Memorial, and a dedicated heritage advisor.

Heritage advisor Ms Liz Vines OAM provided independent advice on heritage matters throughout the jury process and provided written assessment of each competition entry. She was on hand for the jury to consult with during final presentations and deliberations.

As the preferred designs were selected in July 2019 the Memorial has, beyond assembling an Australian design team of the highest quality, engaged specialist heritage advisors to provide advice on the project generally and on specific matters — from a review by expert stone masons on the effect of the proposed glazed link on weathering differentials between areas of sandstone, to heritage architect advice on the potential impact of temporary works.

- c. It was never intended that the Memorial be a static memorial, unchanging and frozen in time. Speaking on the Australian War Memorial Bill 1962, the Honourable Gordon Freeth in his capacity as the Minister for the Interior and Minister for Works stated, *“The main stages in the development of the memorial are now completed. Further developments will occur, but the basic groundwork has been firmly laid.”*

It is in this context that both the Memorial’s previous 10 developments or major gallery refurbishments and the current project are conducted, each with careful consideration of how they have been integrated into that ‘basic groundwork’.

Through business cases and design studies the Memorial has demonstrated that in order for the Memorial to meet its obligations under the *Australian War Memorial Act 1980* as the centre of national commemoration for the next 50-100 years it is necessary to remediate four core failings:

- i. a lack of capacity to provide equitable coverage of conflicts and operations;
- ii. a lack of capacity to describe a broader description of war;
- iii. a lack of circulation space; and
- iv. poor accessibility and access.

This need has been validated by a series of internal studies and external approvals processes which have been subject to oversight from Council and various government levels, including the independent steering committees with representatives from key departments and agencies, and with regular updates available to the public.

Through the Two Stage Capital Works Process the Memorial examined options ranging from doing nothing to staged 30-year development plans. The Memorial has examined all prudent alternatives before reaching the conclusion that to meet all four of these needs and ensure the Memorial’s long-term viability it is necessary to take actions that will have significant impacts on heritage matters.

Alternatives are laid out clearly in Section 4 of the Preliminary Documentation and include those suggested through the public submission process including off-site at the Treloar Technology Centre, satellite or travelling exhibitions interstate, digital or audio visual based displays as well as the varied construction options also outlined such as retaining and expanding the extant Anzac Hall.

The Memorial believes that the proposal put forward is the one that best places it for the future whilst, through careful design and extensive mitigation measures, has the least possible heritage impacts to meet its future needs. It is, and has been demonstrated to be, the most prudent alternative.

- a. The belief that the design outcomes were constrained by the reference design, or that the EOI contained mandatory criteria regarding the reference design is incorrect.

The Memorial elected to conduct a two-stage process of 'Expressions of Interest' and 'Final Concept Stage' on the basis that, through the DBC it already had a reference design, that at a broad level had been demonstrated to meet the Memorial's requirements within the approved budget. Consistent with AIA advice on competitions, seeking an Initial Concept Stage was viewed as an inappropriate use of public funds.

The Memorial further notes that the project team, which included appropriately qualified architectural and engineering experts that developed the reference design had already been selected through an open tender.

Stage one of the two-stage process was a general EOI that covered architectural design packages within the development. Proponents were able to nominate which package(s) they were expressing an interest in.

The focus of the EOI assessment was project history, based on the three detailed exemplar projects provided, and in particular the technical and behavioural approach and client outcomes and did not require a design response of any kind at that point.

The reference design was included within the EOI documents in Section 7 – Reference Design overview. This section explained the reference design in terms of the design outcomes it achieved, and as the reference design included a new two storey Anzac Hall, it did state that the building would be replaced. The Memorial considers the inclusion of the reference design as an important demonstration that the Memorial's requirements (functional design brief) could be satisfied for the allocated budget.

However, the only mandatory criteria to the EOI phase was regarding minimum content and format requirements of the response by the proponent.

Stage Two of the process was a Request for Tender (RFT) phase, incorporating a Project Competition (design competition) as Final Concept Stage, with entrants selected based on a detailed evaluation of expressions of interest.

The Reference Design did not feature as part of the RFT phase. The RFT did not require the removal of the existing Anzac Hall structure.

The RFT included a Design Competition Boundaries drawing, visually indicating the available site area for the project, and suggested limits of the building zone within that site, prepared with full consideration of the requirements of the Memorial's *Heritage Management Plan 2011* including the Parliamentary and Mount Ainslie vistas. The site area did include the existing Anzac Hall.

Architects were free to explore retention and expansion of the Anzac Hall structure as their design solution. The competition brief for the Anzac Hall design package also noted that, "Tenderers have the option available to construct a new Anzac Hall or consider the retention and utilisation of the existing Anzac Hall in their proposed Concept Design option, if the Spatial and Functional Area Requirements can be achieved."

With the exception of the release of a copy of the final jury report at the conclusion of the competition, the competition was conducted in a manner consistent with the minimum criteria of the AIA Architectural Competitions Policy. As a government entity, the Memorial must comply with Commonwealth Procurement Rules and only comment on the preferred design and preferred tenderer in an open and transparent manner. Unsuccessful tenderers were provided with a detailed debriefing of the jury's decision from the project team. The Memorial's approach was consistent with best practice and Commonwealth Procurement Rules.

- b. Per response 9.2.3 (b) above, the Memorial has been guided by the heritage management principles set out by its Heritage Management Strategy 2019 and *Heritage Management Plan 2011* throughout development of both business cases. This includes the reference design produced through the DBC.

The Memorial's *Heritage Management Plan 2011* was available during the EOI process and was specifically issued to design competition entrants selected to participate through the EOI process. The Memorial's expert heritage consultant, Ms Liz Vines OAM, who had extensive knowledge of the *Heritage Management Plan 2011*, was made available to competition architects throughout the concept design period.

Commitment

Nil

Changes to Preliminary Documentation

Section 7.3.7 added new sections 4.4.9 – 4.4.12 JPW Masterplan 2017 to the FPD

Additional section in response to public comment on whether the Memorial properly considered the JPW Masterplan 2017 during the design development phase

9.2.4 *Design Options – Due Process*

Issue

Four submissions, including two from architects who participated in the design competition process, endorsed the design options process used by the Memorial.

Memorial's Response

The Memorial's design options process has been robust and was conducted in accordance with best practice in government procurement.

The endorsement of two of Australia's largest and most highly regarded architectural firms — both of whom participated in the process and had access to documentation and detail not made public — for procurement, commercial and security reasons, is testament to the solidity of the process from an architectural design point of view.

Commitment

Nil

Changes to Preliminary Documentation

Nil

9.3 Section 5 of Preliminary Documentation - Description of Project

The Memorial categorised the public comment regarding Section 5 of the Preliminary Documentation *Description of the Project* into two themes.

SUBMISSION(S)	PD	THEME	ISSUE SUMMARY	RESPONSE SUMMARY
112	S5	Long Term Planning	One submission queried what further long term planning had been done as part of the Project.	The Memorial addressed this in its Preliminary Documentation Section 8 Heritage and Environment Mitigation Measures as Mitigation Strategy 5.

Community Breakdown:

General Public (1)

Commitments:

- Nil

Changes:

- **Section 7.2 Change to Attachments** Refer to updated [Attachment H6](#) Updated Anzac Hall and Glazed Link Drawings and Renders September 2020

137; 138	S5	Main Building	Two submissions cited concerns over a lack of detail on proposed changes to the Main Building.	<p>Key changes to the Main Building derived from other project elements are detailed and assessed in the Preliminary Documentation.</p> <p>Other changes are not included in this PD simply because the interior of the Main Building has undergone constant change since the Memorial was opened in 1941 and from a heritage viewpoint has a generally high tolerance for change internally.</p> <p>The Memorial addressed this issue in its Preliminary Documentation in Section 5.1e and noted that changes to the Main Building would be subject to a heritage assessment process at a later date and will note this as both a formal project commitment and a Mitigation Strategy against possible future heritage impacts.</p>
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Community Breakdown:

Architectural Community (2)

Commitments:

- **Section 7.6.2.1 Commitment 2A – Main Building – Heritage Advice**
The Memorial will appoint an appropriate expert heritage advisor as part of the Main Building design process.
- **Section 7.6.2.2 Commitment 2B – Main Building – Heritage Assessment**
The Memorial will undertake a formal Heritage Impact Assessment, and if necessary further *EPBC Act* referral, for future Main Building architectural or engineering works delivered as part of the Project.

Changes:

- **Section 7.2 Change to Attachments** Refer to [Attachment E3](#) Gallery Masterplan of the FPD

9.3.1 *Project Description – Long Term Planning*

Issue

One submission queried what long term planning consideration had been given to ensure that by 2100 no further expansion will be required or, if it was necessary, where and how it would be placed.

Memorial's Response

The Memorial addressed this in its Preliminary Documentation Section 8 Heritage and Environment Mitigation Measures as Mitigation Strategy 5. This strategy outlines the way that New Anzac Hall has been designed and engineered to be expandable in the future in the event that additional exhibition space is required. This future expansion has capacity of not less than 2,790m² which can be delivered in stages if required.

These plans are part of the Memorial's prioritisation of project outcomes which, after safety, recognises that this is a once in a multi-generational project and accordingly sets 'maximise built outcomes' as a high priority for the project.

Commitment

Nil

Changes to Preliminary Documentation

Section 7.2 Change to Attachments Refer to updated Attachment H6 Updated Anzac Hall and Glazed Link Drawings and Renders September 2020

9.3.2 *Project Description – Main Building Changes*

Issue

Two submissions cited concerns over a lack of detail on proposed changes to the Main Building and possible future heritage impacts of same.

Memorial's Response

Key changes to the Main Building derived from other project elements such as the interface of the New Southern Entrance and the Main Building or changes to access/entry at the back of the Main Building to the Glazed Link are detailed and assessed in the Preliminary Documentation.

The Memorial acknowledges that beyond these interface details there is a lack of specific detail on other changes to the Main Building. This is in large part because the interior of the Main Building has undergone constant change since the Memorial was opened in 1941 and from a heritage viewpoint has a generally high tolerance for change internally.

The Memorial addressed this issue in its Preliminary Documentation in Section 5.1e and noted that changes to the Main Building would be subject to a heritage assessment process at a later date.

Commitments

Section 7.6.2.1 Commitment 2A – Main Building – Heritage Advice

The Memorial will appoint an appropriate expert heritage advisor as part of the Main Building design process.

Section 7.6.2.2 Commitment 2B – Main Building – Heritage Assessment

The Memorial will undertake a formal Heritage Impact Assessment, and if necessary further *EPBC Act* referral, for future Main Building architectural or engineering works delivered as part of the Project.

Changes to Preliminary Documentation

Section 7.2 Change to Attachments Refer to Attachment E3 Gallery Masterplan of the FPD

9.4 Section 6 of Preliminary Documentation - Assessment against EPBC Act

The Memorial categorised the public comment regarding Section 6 of the Preliminary Documentation Assessment against the *EPBC Act* into one theme.

SUBMISSION(S)	PD	THEME	ISSUE SUMMARY	RESPONSE SUMMARY
001; 058; 103; 138	NEW	Environmental impact of replacement of Anzac Hall	Four submissions objected that the project assessment against the <i>EPBC Act</i> had failed to take into account the environmental impact of the replacement of Anzac Hall, highlighting that the building was less than 20 years old, and stating that there was considerable loss of embedded energy and wastage of materials involved in replacing the building prior to its expected 50–100 year lifespan.	The Memorial acknowledges this impact and will offset it through a variety of mitigation strategies including re-use of material from the current Anzac Hall, the delivery of an energy efficient project outcome, and the use of recycled building materials where practicable and cost effective.

Community Breakdown

Architectural Community (3); General Public (1);

Commitments:

- **Section 7.6.3.2 Commitment 3B – Anzac Hall building material re-use**
The Memorial will reuse/recycle/repurpose as much of the Anzac Hall building material as practical consistent with the National Waste Policy Action Plan 2019.
- **Section 7.6.1 Commitment 1 – Mitigation Strategy 17 – Environmental Management through Construction**
The Memorial will put in place, monitor and report against Construction Environmental Management Plans (CEMPs) in accordance with all relevant legislation and codes during construction.

Changes:

- Nil

9.4.1 *Assessment against EPBC Act – Environmental Impact of Replacement of Anzac Hall*

Issue

Four submissions objected that the project assessment against the *EPBC Act* had failed to take into account the environmental impact of the replacement of Anzac Hall, highlighting that the building was less than 20 years old, and stating that there was considerable loss of embedded energy and wastage of materials involved in replacing the building prior to its expected 50–100 year lifespan.

Memorial's Response

The Memorial's engineering design team is examining potential elements of Anzac Hall for re-use in construction works, including the reuse of steel beams and precast concrete panels. The latter is most likely to be based on incorporating the panels to the south, east and northern walls of the Central Energy Plant (CEP) building, delivered as part of the Bean Building works. It may also be possible to reuse elements of the roofing material and structure in this work.

Concrete will be reused on site as part of business as usual for all major construction works. The Memorial will reduce, reuse and recycle in order to reduce the amount of construction materials directed to landfill and will, in accordance with government policy, seek to include recycled or re-used materials as part of its construction works.

The Project will deliver a number of green initiatives to offset its environmental impact and minimise future energy use. The Memorial has proposed a rooftop photovoltaic system for the existing Bean Building and Research Centre and CEP roofs away from the central axis of the site. Based on the proposed size of the system it is expected to generate in the order of 300,000 kWh per year.

The Project has committed to two rainwater harvesting tanks to collect roof water runoff – a 520kL tank to the west of Anzac Hall and a 50kL tank the north of the Bean Building. Collected water will be used for sanitation, site irrigation and supply to cooling towers at the CEP.

The project is consistent with the publicly available *Energy and Environmental Policy*. In accordance with DAWE requirements, this policy was examined as part of the Memorial's *EPBC Act* referral in 2019 and is available at *Attachment A Part H to the July 2020 Preliminary Documentation*. During construction the Memorial will put in place, monitor and report against a Construction Environmental Management Plan (CEMP) in accordance with relevant legislation and codes.

Commitment

Section 7.6.3.2 Commitment 3B – Anzac Hall building material re-use

The Memorial will reuse/recycle/repurpose as much of the Anzac Hall building material as practical consistent with the National Waste Policy Action Plan 2019.

Section 7.6.1 Commitment 1 – Mitigation Strategy 17 – Environmental Management through Construction

The Memorial will put in place, monitor and report against Construction Environmental Management Plans (CEMPs) in accordance with all relevant legislation and codes during construction.

Changes to Preliminary Documentation

Nil

9.5 Section 7.2 of Preliminary Documentation - Impacts on Heritage Values New Southern Entrance

The Memorial categorised a total of 21 public comments regarding Section 7.2 of the Preliminary Documentation Identification of Impacts on Values into nine themes.

SUBMISSION(S)	PD	THEME	ISSUE SUMMARY	RESPONSE SUMMARY
027; 055; 082; 087; 126; 135; 140;	S7.2	New Southern Entrance – Changes Supported	Seven submissions provided general support for the changes delivered by the New Southern Entrance – in particular changes to accessibility and visitor service improvements - and their integration with the Main Building and site overall	This feedback is consistent with the majority of public feedback received through earlier EPBC consultation undertaken by the Memorial.

Community Breakdown

Descendants Community (2); General Public (1); Veterans Community (4)

Commitments:

- Nil

Changes:

- Nil

143	S7.2.1	Façade not unchanged	One submission states that the Memorial has incorrectly described the façade of the Main Building as unchanged.	The façade of the Main Building remains unchanged including the reinstatement of original building fabric. The Memorial has correctly described the changes to the vista from the south.
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Community Breakdown

Community Interest Groups (1)

Commitments:

- Nil

Changes:

- Nil

055; 097; 140	S7.2.3	Support for the change to the visitor arrival experience	Three submissions expressed general support for the change to the visitor arrival experience noting that the current entrance was unsuitable for more than 1 million visitors a year and praising the separation of the logistics of arrival from entry into the commemorative spaces of the Memorial.	The Memorial recognises this need as outlined in the Preliminary Documentation and will meet it in the future. The Memorial has retained the original entrance as an option for visitors who wish to use it.
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Community Breakdown

General Public (2); Veterans Community (1)

Commitments:

- Section 7.6.2.3 Commitment 2C – Retention of public access to existing Main Building Foyer**
The Memorial will retain the existing entrance to the Commemorative Area through the Main Building Foyer at completion of construction for any and all visitors in the same manner as entry is undertaken today.

Changes:

- Nil

103; 107; 111; 118 127; 137; 138; 152	S7.2.3	Concerns about the change to the visitor arrival experience	Eight submissions raised issues relating to the changed arrival experience including concerns the original entrance would be closed, that there would be change to the balance of commemoration and museum experience and that the Oculus would prevent direct entry to the Memorial along the land axis.	<p>The Memorial has carefully considered the impact of the changed arrival experience in the context of the transition from <i>entrant</i> to <i>visitor</i> and believes them to be positive overall.</p> <p>The Memorial has retained the existing entry point and visitors can choose to arrive through it to receive the current arrival experience if so desired. The impact of the Oculus is acknowledged and the Memorial has consulted with DAWE on suitable design detail to minimise the impact of this change on the experience.</p>
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Community Breakdown

Architectural Community (3); Community Interest Groups (1); Descendants Community (1); General Public (2); Government (1)

Commitments:

Section 7.6.3.3 Commitment 3C - Oculus Detailing

The Memorial will work with DAWE and NCA to ensure appropriate final detailing for the Oculus is agreed and delivered.

Changes:

- Section 7.2 Change to Attachments** Refer to [Attachment D](#) Heritage Impact Statement of the FPD
Updated Heritage Impact Statement following design detail changes in response to public and DAWE feedback.
- Section 7.2 Change to Attachments** Refer to updated [Attachment G5](#) Updated New Southern Entrance Drawings and Renders
September 2020 of the FPD
Updated plans, renders and architectural comment detailing changes to with updated Oculus designs.

111; 137; 143; 157	S7.2.4	Structural Risk from Subterranean Connection	Four submissions expressed concerns over structural risk from excavation works under or adjacent to the Main Building.	The Memorial has identified these risks and mitigated them through careful architectural and engineering design and construction methodologies as laid out in Attachment M - New Southern Entrance Architectural Heritage Response of the PD including a dedicated heritage buffer zone.
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Community Breakdown

Architectural Community (1); Community Interest Groups (1); Descendant Community (1); General Public (1)

Commitments:

- Nil

Changes:

- Nil

127; 152	S7.2.5	Glass Lift	Two submissions raised concerns over the installation of a glass lift as part of the New Southern Entrance questioning why this could not be replaced with ramped access to minimise visual intrusion.	Due to the difference in elevation between the east and west arrivals points it is not practicable to install a ramp in the place of the lift; such a ramp would require multiple switchbacks to meet accessibility requirements and would require a greatly extended journey for those with mobility issues. DAWE was consulted on minimising the heritage impacts of the lift design which has been redesigned to be the least intrusive option to provide fair and equitable access, noting that it will be sited far off the viewing and land axes.
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Community Breakdown

Community Interest Groups (1); Government (1)

Commitments:

- **Section 7.6.3.4 Commitment 3D – New Southern Entrance Glazed Lift**

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

Changes:

- **Section 7.3.14** New Section 5.3.3 Response to Public and DAWE Comments
Additional section in response to public and DAWE comment on the New Southern Entrance particularly on the glazed lift and Oculus.
- **Section 7.2 Change to Attachments** Refer to [Attachment G3](#) architectural response to technical issues received of the FPD and updated [Attachment G5](#) Updated New Southern Entrance Drawings and Renders September 2020 of the FPD with updated plans, renders and architectural comment detailing changes to with updated Oculus designs.

111; 143	S7.2.6	Oculus inserted into Main Building forecourt	Two submissions raised concerns over the proposed Oculus element including that there was insufficient documentation to demonstrate the Oculus would provide the claimed view of the Hall of Memory, that it would be a trip hazard or would not be able to bear the weight of vehicular traffic.	The renders of the view provided by the Oculus were 3D modelled from the plans and are accurate; the Memorial will provide additional sectional drawings to provide further assurance of their accuracy. The Oculus has been through a safety in design process to mitigate the possibility of tripping over it. Similarly the forecourt has been structurally design for appropriate vehicle loadings and a bund wall provided around the Oculus to prevent accidental traversal by vehicles.
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Community Breakdown

Community Interest Groups (1); General Public (1)

Commitments:

- Nil

Changes:

- **Section 7.3.14 New Section 5.3.3** Response to Public and DAWE Comments
Additional section in response to public and DAWE comment on the New Southern Entrance particularly on the glazed lift and Oculus.
- **Section 7.3.15 New section 5.3.4** New Southern Entrance Lighting Solution
Additional section in response to public comment on lighting impacts of the project.
- **Section 7.2 Change to Attachments** Refer to [Attachment G3](#) architectural response to technical issues received of the FPD and updated [Attachment G5](#) Updated New Southern Entrance Drawings and Renders September 2020 of the FPD

Supportive: 027; 031; 055; 082; 087; 126; 135; 140; Not supportive: 036; 103; 107; 112; 118; 127; 137; 143; 156; 157;	S7.2.7	Parliament House Vista from the south	18 submissions commented on the changes to the vista from the south delivered by the project or on the architecture in general. Of these comments eight were supportive of the changes, finding them to be sympathetic or appropriate and in keeping with the overall site, while ten were not supportive of the changes.	It is not unusual for opinion to be split on whether the changes will be aesthetically pleasing in their own right and whether they have a positive impact on the formal Parliament House Vista. The Memorial believes that the verbal descriptions and visual imagery supplied is of sufficiently high quality, accurately representative of what will be built if approved and provides sufficient viewing angles to allow viewers to make up their own minds on this matter.
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Community Breakdown

Supportive: Descendant Community (2); General Public (2); Veterans Community (4)

Not supportive: Architectural Community (2); Community Interest Groups (3); Descendants Community (2); General Public (3)

Commitments:

- Nil

Changes:

- **Section 7.3.23 New section 5.7** Parade Ground
Additional section describing how the Memorial has addressed the comments from the public and DAWE through refinement of the proposed changes to the Parade Ground
- **Section 7.2 Change to Attachments** Refer to Attachment J of the FPD with updated Public Realm concept design

127	NEW	Southern Entrance – Parade Ground level access	One submission raised concerns about access to the southern entrance from the Parade Ground not being practical and security issues relating to visitor arrival or vehicle intrusion.	The access points at the Parade Ground level are not intended for regular use but rather will support ceremonial arrangements for major events. Vehicle intrusion has been considered across the site and appropriate security measures will be implemented.
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Community Breakdown

Community Interest Groups (1)

Commitments:

- Nil

Changes:

- Nil
-

9.5.1 *New Southern Entrance – Changes Supported*

Issue

Seven submissions expressed support for the general concept of the New Southern Entrance in particular, accessibility and visitor service improvements and its proposed execution through the designs presented. These submissions found that the change is designed sensitively and in keeping with the emotional character of the building.¹²

Memorial's Response

Throughout the consultation period there has been broad appreciation for the concept and execution of the New Southern Entrance.¹³

The concept of an additional underground southern entry has been part of the Memorial's master planning since 2011 and follows established principles for increasing accessibility and visitor experience.

Through delivery of the project the Memorial will meet the growing needs of visitors in the immediate and long term future and ensure that all Australians are able to visit the Memorial on equitable terms.

Commitment

Nil

Changes to Preliminary Documentation

Nil

9.5.2 *New Southern Entrance – Façade Not Unchanged*

Issue

One submission makes the claim that the Memorial's description of the façade of the Main Building as being unchanged is inaccurate.

Memorial's Response

The Memorial's Preliminary Documentation does not make this claim. The only reference to an unchanged façade in the documentation is in Attachment S1, Appendix B EPBC Online Survey Social Heritage Consultation report. This report accurately states that the heritage façade remains unchanged.

The Memorial has been careful, in accordance with its *Heritage Management Plan 2011*, to ensure that the façade of the Main Building remains unchanged by the project. The Memorial has been equally careful to describe and assess the visual changes to the south of this building due to the proposed New Southern Entrance including the Oculus element and the new façade created by the 'blade walls' of the new space. The Memorial will remove, store and reinstate all original stonework connected to the Main Building as part of these works. In doing so it will ensure that the façade of the Main Building remains unchanged.

¹² Submission 031, General Public

¹³ July 2020 Preliminary Documentation Attachment S1 EPBC Act National Consultation Report, Heritage: Physical Changes to Site/Vistas – Southern Entrance pp. 13, 28

Commitment

Nil

Changes to Preliminary Documentation

Nil

9.5.3 New Southern Entrance – Change to the visitor arrival experience supported

Issue

Three submissions expressed general support for the change to the visitor arrival experience engendered by the New Southern Entrance. Public comment in support of the proposed change to the visitor arrival experience centred on improvements to accessibility and support for the concept of dissociating the logistics of arrival at the site (such as cloaking and security checks) with entry into the commemorative spaces of the Memorial. Supportive comments also noted that the original entry was not suitable for visitation levels in excess of one million persons per year.

Memorial's Response

The Memorial recognises this need as outlined in the Preliminary Documentation and project delivery will ensure that it is met. The uncoupling of the mechanics of arriving at the Memorial — including security bag checks, cloaking and orientation — from arrival into the ceremonial spaces will allow visitors to better appreciate the Commemorative Area upon entry.

The creation of alternative entry points will also assist in eliminating issues around congestion experienced with the current single point of entry and exit through which all one million plus visitors a year currently traffic. Operating two entrances will enhance the Memorial's entry/exit capacity in particular the ability to deal with the simultaneous arrival or exit of multiple groups of visitors such as coach tours, school groups etc. or to more efficiently deal with high visitation numbers during peak times such as around Anzac Day or during the Christmas or Floriade periods.

The proposed change also enhances the Memorial's ability to respond to changes in the national threat level and provide greater security for visitors.

The change will also support better pedestrian traffic flows to or from ceremonial events in the Commemorative Area such as the daily Last Post Ceremony and in particular accessible access for these events which is currently limited by the one small lift available.

This change follows best practice and has been adopted by the leading cultural institutions around Australia and the world.

Commitment

Section 7.6.2.3 Commitment 2C – Retention of public access to existing Main Building Foyer

The Memorial will retain the existing entrance to the Commemorative Area through the Main Building Foyer at completion of construction for any and all visitors in the same manner as entry is undertaken today.

Changes to Preliminary Documentation

Nil

9.5.4 New Southern Entrance - Concerns about the change to the visitor arrival experience

Issue

The Memorial received eight submissions expressing concerns about the change to the arrival experience on five specific matters:

- a. Three submissions objected to the New Southern Entrance on the mistaken belief that it removed the ability of visitors to enter via the current entry. One submission contended that the New Southern Entrance should only be approved on the condition that the current entry was permanently retained as an access point for all visitors;
- b. One submission asserted that the change to the arrival experience contravened *Policy Action Commemorative Area 1.1.3* of the Memorial's *Heritage Management Plan 2011*;
- c. Two submissions, while accepting the need for better accessibility, questioned whether the change to the entrance sequence would negatively affect the balance of commemorative and museum experience for visitors, and asked if the full impact the immediate and profound arrival experience had been properly considered;
- d. One submission stated that the inclusion of the Oculus would preclude a direct line of access into the Main Building along the Burley Griffin and Parliamentary axes;
- e. One submission expressed concerns that the new subterranean entrance to the south would be little used, and argued that the arrival experience from the new eastern stairs or western ramp was circuitous, depriving visitors of the view of the façade of the Main Building, stating that the view of the dome of the Hall of Memory through the Oculus was an insufficient replacement. This submission also raised concerns regarding actual view through the Oculus and noted that no sectional view was available to determine viewing angles.

Memorial's Response

- a. As stated in Section 9.5.3 of this report the Memorial is committed to the retention of the original entry for all visitors; no change to the operation of this access point will occur as a result of this project.
- b. Policy Action Commemorative Area 1.1.3 of the Memorial's *Heritage Management Plan 2011* states,

*1.1.3 Converse [sic] and manage the symbolic arrival into the main building through the Commemorative Area and the experience of the grand vista on of Griffin's land axis on arrival and departure.*¹⁴

Hector Abrahams Architects, as heritage architects for the project, provided the following summary of the impact of the alteration to the New Southern Entrance:

¹⁴ Australian War Memorial Heritage Management Plan 2011, p.75

*The proposed alterations to the southern entrance provide rationalised and completely equitable access to the War Memorial commemoration spaces and exhibition halls. The proposal retains the ceremonial front entrance while providing a functional entryway that accommodates the need for security and visitor services. This considerably enhances the historical and iconic purposes of the Australian War Memorial.*¹⁵

Noting the limited impact of the Oculus on the Griffin land axis vista, the Memorial believes that, through the retention of the current entry, the proposed changes comply with this policy requirement while enhancing accessibility and improving the functional or logistical aspects of arrival.

- c. The Memorial has closely considered the impact of the change in arrival sequence, taking into consideration the experiences of recent changes at similar institutions including the Shrine of Remembrance and the Hyde Park Anzac Memorial. It has also reviewed the plans of other institutions, such as the Imperial War Museum which plans similar below grade access to some of its sites to improve accessibility and visitor flow.

These assessments have been conducted with the advice and guidance of the project's architects and accessibility consultants.

Together with visitor research, this has allowed the Memorial to examine the four key elements of the transition of an *entrant* into a *visitor* at the Memorial's existing main entry. These phases are: arrival, orientation, service, and preparation.¹⁶ This transition is currently disrupted at the Memorial, leading to many visitors' first experience of the Memorial and the Commemorative Area in particular being less than ideal.

Under the current entry sequence, security screening, cloaking and orientation occur in the Commemorative Area foyer. This space is simultaneously used for entry and exit, is adjacent to the reception space and a busy retail space, and is the assembly point for a guided tours. Education tours, staff and contractors also transit through this area on a regular basis.

The Commemorative Area is also the site of regular ceremonial activity such as the standing of a catafalque party of Australia's Federation Guard around the Tomb of the Unknown Australian Soldier, and other activities — including media interviews — further congests this area.

A visitor's first sight of the Commemorative Area often occurs through a crowd undergoing security screening, exiting shoppers from the retail space, or while being jostled by a passing school group. Many visitors choose to go into the reception area to cloak items and receive orientation from staff before returning to the Commemorative Area.

The nature and volume of this activity and the disrupted arrival sequence is inconsistent with people arriving in the most receptive frame of mind to experience the profound nature of the Commemorative Area — the majority of people who enter this space do so as entrants not visitors.

¹⁵ Preliminary Documentation Attachment C, p.15

¹⁶ "The museum foyer as a transformative space of communication", Ditte Laursen, Erik Kristiansen and Kirsten Drotner, *Nordisk Museologi*, Vol. 1, 2016, pp. 69–88, available at: www.nordiskmuseologi.org/English/Ditte%20Larsen,%20Erik%20Kristiansen%20og%20Kirsten%20Drotner%202016-1.pdf

Laursen, Kritiansen and Drotner quote Jill Delaney's comparison of museum arrival to that of entering a temple or church in their 2016 study of museum entries:

As the visitor leaves the busy street, he or she needs to relax and adopt a calm, receptive mood before entering the displays. It is instructive to look at how temples are designed in many parts of the world: they very often have an entrance court, garden, or hall, where the worshipper can get into the right mood before entering the temple itself.¹⁷

The proposed New Southern Entrance will, based on the experience of institutions such as the Shrine of Remembrance and the Louvre, allow the Memorial to create a new and improved visitor arrival sequence that better manages the transition of entrant to visitor. Visitors will undertake the mechanics of the arrival and only, once properly prepared, move into the Commemorative Area as a visitor not, as currently, an entrant.

It will not be - *nor can it be* in the modern era of million visitors a year, security requirements, bus tour groups and more – the same arrival sequence experienced by the 50,000 visitors a year during the 1950s after the Memorial had opened and wartime restrictions on travel had been lifted. Arrival via the New Southern Entrance will provide a more fitting and profound arrival experience than the current often congested and noisy foyer. Additionally with the expected reduction in entry/exit via the current entrance a moderate move towards the 'original entry experience' for those who choose this entry can be expected.

- d. Section 4.2 of the July 2020 Preliminary Documentation Attachment C Heritage Impact Statement acknowledges the impact of Oculus and notes that it may be partially mitigated through appropriate detailing. The Memorial has accepted the concerns raised in these submissions and has undertaken extensive consultation with DAWE on the Oculus design throughout August 2020. Modifications described in the September 2020 Final Preliminary Documentation have mitigated this impact to the maximum extent practicable.
- e. The doors from the New Southern Entrance onto the Parade Ground (the 'subterranean entrance to the south') have been designed for use on ceremonial occasions only and not for general public use. This entrance will facilitate the movement of ceremonial personnel, security or first aid staff and dignitaries on days such as Anzac Day and Remembrance Day only. Access into the New Southern Entrance on a day to day basis will be via the eastern and western access points.
- f. The Memorial has carefully considered the new arrival sequence and does not believe it is circuitous. The new arrival sequence will assist in the transition from entrant to visitor. Response 9.5.4 (c) provides further detail on the changes to arrival sequence and the transition from entrant to visitor. The proposed design retains the capacity for visitors to enter via the existing entrance and view the façade of the Main Building upon entry. The Memorial acknowledges that the, optional, arrival sequence via the New Southern Entry will be different to that of past visitors in this regard but again notes that as the world has changed, in some ways so too must the Memorial to accommodate that change.

¹⁷ Ibid, p.75

Commitment

Section 7.6.3.3: Commitment 3C Oculus Detailing

The Memorial will work with DAWE and NCA to ensure appropriate final detailing for the Oculus is agreed and delivered.

Changes to Preliminary Documentation

Section 7.2 Change to Attachments Refer to Attachment D Heritage Impact Statement of the FPD Updated Heritage Impact Statement following design detail changes in response to public and DAWE feedback

Section 7.2 Change to Attachments Refer to updated Attachment G5 Updated New Southern Entrance Drawings and Renders September 2020 of the FPD
Updated plans, renders and architectural comment detailing changes to with updated Oculus designs.

9.5.5 New Southern Entrance- Structural Risk from Subterranean Connection

Issue

The Memorial received four submissions expressing concerns about structural risks relating to the subterranean connection of the proposed New Southern Entrance and the existing Main Building. The primary concern raised was that the Memorial had not provided sufficient detail of the proposed methodology and was relying on an un-researched approach.

Memorial's Response

The Memorial identified structural risks during its Safety in Design process. The Preliminary Documentation describes these risks and proposed mitigation strategies.

A heritage buffer will be created to protect existing footings/foundations to the east and west portions of the facade. The central façade access is advantaged by the existing plant room below the forecourt, providing an existing opening into the heritage building, in which to access the main structure and conduct underpinning. Section 7.2.4 of the July 2020 Preliminary Documentation, and Attachment M New Southern Entrance Architectural Heritage Response lays out this methodology, as proposed by the projects structural and civil engineers Taylor Thomson Whitting.

The methodology is informed by extensive geotechnical surveys and studies and by expert heritage masonry advice from Jasper Swann in Attachment L – Stone Report 1 Stone Replacement regarding the stone elements.

The building techniques being employed are well tested and proven, there are no high risk new processes being deployed. Active monitoring during construction works will occur.

Commitment

Nil

Changes to Preliminary Documentation

Nil

9.5.6 *New Southern Entrance– Glass Lift Access to New Southern Entrance*

Issue

Two submissions expressed concerns relating to the proposed glass lift to provide accessible access to the New Southern Entrance. One submission (152) simply notes the inclusion of an external lift as an individual action that should be reconsidered but provides no specific reasoning. The other submission (127) questioned why the eastern entry could not be a ramped entry in the same manner as the western side thereby providing accessible access without the need for a lift.

Memorial's Response

To the west of the New Southern Entrance, a new gentle ramp provides equitable access from the western landscape setting and surface car parking and from the administration building.

To the east however, there are three key levels or topography that need to be connected. The first is the surface level to the New Southern Entrance, which involves a roughly 5.5 metre change in level. The second is from the existing basement parking level, which sits 3.3 metres below the surface level and then 2.2 metres above the new entrance level. Any equitable connection must connect three levels: the ground or surface level; the carpark 3.3 metres below; and the New Southern Entrance level, a further 2.2 metres below.

This connection is critical for arrival into the New Southern Entrance and Memorial, and so that the public can connect to the Bean Building for access to research facilities and Poppy's Café.

The Memorial's proposal locates the lift in a location that:

- Connects all three levels, of the ground plane, the basement carpark and the New Southern Entrance;
- Is as far from the existing Memorial building as possible, while being on the western side of the eastern access road;
- Provides the opportunity for connection to Poppy's Café and the Bean Building;
- Provides the opportunity for connection from vehicle drop off, including bus parking on the eastern road in front of Poppy's Café;
- Sits adjoining the primary stair within the Eastern Courtyard so that patrons arrive and depart in a similar location; this is necessary in order to avoid indirect discrimination as described by the *Disability Discrimination Act 1992*— when those with a disability are treated less favourably through the path of travel or distance to travel;
- Provides a connection that is intuitive, direct and logical, without extensive waiting time or travel in potentially inclement weather.

The Memorial explored whether a ramp could be used to traverse from the ground plane to the car park, continuing down to the New Southern Entrance.

The key challenge with a ramp is the requirement to traverse 5.5 metres in height, resulting in a ramp length of 88 metres. Such a distance of ramp relies on switchback ramping that includes extensive clutter of ramps, landings, balustrades, handrails and tactile indicators, as opposed to a simple and elegant lift to navigate the change in levels.

The fundamental concern with this length of ramp is that it requires those with accessibility challenges to travel an additional 88 metres.

The Memorial conducted design studies for the location (8 possible locations), materiality (4 possible options), and lift car systems (2 possible options) for the lift car in order to minimise visual impact on the Main Memorial Building.

Following consultation with DAWE, a lift in the nominated location has been agreed as a means of providing equitable access. The proposed design – noting that it will be sited far off the viewing and land axes, when combined with landscape screening and glazed componentry, will provide the least obtrusive solution.

The lift will only be visible when in operation, as the lift car will be set to automatically return to the below ground level position when not in use. While the length of travel is not considered reasonable or appropriate for regular access, ramps to access each level will be available should the lift be out of service.

Commitment

Section 7.6.3.4 Commitment 3D – New Southern Entrance Glazed Lift

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.

Change to Preliminary Documentation

Section 7.3.14 New Section 5.3.3 Response to Public and DAWE Comments

Additional section in response to public and DAWE comment on the New Southern Entrance particularly on the glazed lift and Oculus.

Section 7.2 Change to Attachments Refer to [Attachment G3](#) architectural response to technical issues received of the FPD and updated [Attachment G5](#) Updated New Southern Entrance Drawings and Renders September 2020 of the FPD with updated plans, renders and architectural comment detailing changes to with updated Oculus designs.

9.5.7 *New Southern Entrance – Oculus Inserted Into Main Building Forecourt*

Issue

Two submissions raised concerns over the proposed Oculus element including that there was insufficient documentation to demonstrate the Oculus would provide the claimed view of the Hall of Memory, that it would be a trip hazard or would not be able to bear the weight of vehicular traffic.

- a. One submission stated that the inclusion of the Oculus would preclude a direct line of access into the Main Building along the Burley-Griffin and Parliamentary axes;
- b. One submission expressed concerns regarding the view through the Oculus and noted that no adequate sectional view was available to determine viewing angles to provide assurance the view provided in the renders was accurate;
- c. One submission expressed concern about people falling in or on to the Oculus; and
- d. One submission expressed concern that the Oculus would not be able to bear the weight of vehicle traffic across the forecourt.

Memorial's Response

- a. This issue has been addressed as part of Response 9.5.4 (d) as the concern is specifically with the change to the entry sequence caused by the Oculus.

There are already a number of extant features on the direct line of access including the Stone of Remembrance and Pool of Reflection and Eternal Flame on the site. Direct access along the length axes is impeded by Lake Burley Griffin and traffic on Anzac Road.

The minor deviation required to directly access the Main Building from the Parade Ground is no more intrusive than that caused by the Stone of Remembrance.

- b. The renders provided in the Preliminary Documentation are generated from the New Southern Entrance architecture through 3D modelling software and are an accurate reflection of the view that will be available.

The Memorial has examined the viewing angles of the Oculus and is confident in the geometry and other matters — such as reflection, refraction and the clarity of the glass— that the dome of the Hall of Memory will be clearly visible to visitors through the Oculus.

- c. Through the safety in design process the Memorial has put suitable fall protection measures in place to prevent this from occurring. In the event that someone deliberately tries to walk or stand on it, the Oculus has been designed to withstand human-imposed loading.
- d. The structural capacity of the entire forecourt has been carefully considered in the light of operational requirements including large vehicle movement across the area. The forecourt area includes sufficient room for controlled vehicle traffic around the Oculus and has a discrete bund wall to prevent accidental traffic.

Commitment

Nil

Change to Preliminary Documentation

Section 7.3.14 New Section 5.3.3 Response to Public and DAWE Comments

Additional section in response to public and DAWE comment on the New Southern Entrance particularly on the glazed lift and Oculus.

Section 7.3.15 New section 5.3.4 New Southern Entrance Lighting Solution

Additional section in response to public comment on lighting impacts of the project.

Section 7.2 Change to Attachments Refer to Attachment G3 architectural response to technical issues received of the FPD and updated Attachment G5 Updated New Southern Entrance Drawings and Renders September 2020 of the FPD

9.5.8 *New Southern Entrance– Parliament House Vista from the South*

Issue

18 submissions commented on the changes to the vista from the south delivered by the project or on the architecture in general. Of these comments eight were supportive of the changes, finding them to be sympathetic or appropriate and in keeping with the overall site, while ten were unsupportive.

Those who did not support the changes raised several issues:

- a. Three submissions expressed concerns that the introduction of additional built elements (the blade wall) under the Memorial challenges the discrete placement of the Memorial in a simple landscape setting or create a distraction from the visual supremacy of the Main Building;
- b. One submission requested that the Memorial make provisions to support temporary shade/cover structures for major events such as Anzac Day; and
- c. Eight submission expressed concern that the design, through changes to the parade ground, introduction of built elements earlier on the vista and generally a more formal or rigid design adversely impacted the vista or the broader Griffin Land Axis.

Memorial's Response

While not unusual, opinion is split on whether the changes will be aesthetically pleasing in their own right and whether they have a positive impact on the formal Parliament House Vista.

The Memorial believes that the verbal descriptions and visual imagery supplied is of sufficiently high quality, accurately representative of what will be built if approved, and provides sufficient viewing angles to allow viewers to make up their own minds on this matter.

- a. The Memorial has provided an extensive series of comparison photos and photomontages of the existing and proposed views as Attachment O3 Existing and Proposed Comparison at 250m

intervals along Anzac Parade July 2020 Preliminary Documentation, to allow assessment of this potential impact.

These were a part of the package of documentation assessed by Hector Abrahams Architects who prepared the July 2020 Preliminary Documentation Attachment C Heritage Impact Statement. The addition of the blade wall built element is not assessed as a negative impact in this report.¹⁸ The Memorial agrees with this assessment and notes that through its public surveys there has been a high level of support for the changes to the southern vista related to the project.

- b. This suggestion is an operational matter and has been passed to the Memorial's Commemoration and Visitor Engagement Section for consideration. Nothing in the proposed changes would preclude the provision of such shelters if an operational decision is made to provide them.
- c. The Memorial refers readers to the July 2020 Preliminary Documentation Attachment O3 Existing and Proposed Comparison at 250m intervals along Anzac Parade to assess this impact for themselves and again notes that the independently prepared July 2020 Preliminary Documentation Attachment C Heritage Impact Statement finds the changes sympathetic.

The Heritage Impact Statement finds that through the change of parade ground layout the Main Building becomes the terminus of the land axis and views rather than the parade ground as under the current arrangement. The Memorial agrees with this assessment and believes the overall impact of the New Southern Entrance on the Griffin Land Axis is positive as a result.

Commitment

Nil

Change to Preliminary Documentation

Section 7.3.23 New section 5.7 Parade Ground

Additional section describing how the Memorial has addressed the comments from the public and DAWE through refinement of the proposed changes to the Parade Ground

Section 7.2 Change to Attachments Refer to Attachment J of the FPD with updated Public Realm concept design

¹⁸ July 2020 Preliminary Documentation Attachment S1 EPBC Act National Consultation Report, Heritage: Physical Changes to Site/Vistas – Southern Entrance p. 28

9.5.9 *New Southern Entrance – Parade Ground Level Access*

Issue

One submission raises concerns about access to the southern entrance from the Parade Ground being impractical as there is no parking to support access from this avenue. The same submission raises security issues relating to visitor arrival away from the main security check points or the possibility of vehicle intrusion at this level.

Memorial's Response

This comment misconstrues the intent of the entry/exit points to the Parade Ground. These doors are intended to support ceremonial activity on the Parade Ground and facilitate emergency egress where necessary. These doors are not intended for day to day use by visitors. The Memorial's assessment of circulation and access improvements relating to the Southern Entrance clearly refer to arrivals from the north, west and east whether they are via public transport, school or tour coach or the public car parks in these areas.

The Memorial has engaged consultants to provide physical security advice for the entire site, including advice relating to hostile or accidental vehicular intrusion. The Memorial is unable to publicly disclose these plans but notes that they are based on best practice advice from relevant government security agencies. The Memorial's security team will work in close co-ordination with these agencies on delivery of security infrastructure for the entire site to ensure the safety of visitors and collections.

Commitment

Nil

Change to Preliminary Documentation

Nil

9.6 Section 7.3 of Preliminary Documentation - Impacts on Heritage Values New Anzac Hall and Glazed Link

The Memorial received a total of 41 submissions relating to Section 7.3 of the Preliminary Documentation and categorised them into the following seven themes.

SUBMISSION(S)	PD	THEME	ISSUE SUMMARY	RESPONSE SUMMARY
Supportive: 082; 087; 097; 126; 140; 055	S7.3.2	Replacement of existing Anzac Hall – General Comment	35 submissions were received on the general theme of the replacement of Anzac Hall.	The Memorial has clearly described the rationale and the necessity of this decision through its Preliminary Documentation.
Not supportive: 001; 002; 020; 031; 033; 034; 042; 055; 057; 065; 074; 076; 078; 080; 085; 103; 111; 112; 114; 118; 127; 137; 139; 143; 147; 152; 153 157; 163;			Six were generally supportive of the proposal while 29 were not. Supportive submissions acknowledged that the building is not fit for purpose or that the need to tell contemporary veterans' stories was more important than the need to retain the building.	The replacement of Anzac Hall will enable the Memorial to remain fit for purpose as the centre of national commemoration for the next 50-100 years, something that no amount of modification to the existing building can achieve. The Memorial has formally committed to mitigation strategies to minimise the impact of this change and to record the history of the existing building.

Community Breakdown

Supportive: General Public (2); Veterans Community (4)

Not Supportive: Architectural Community (7); Community Interest Groups (3); Descendants Community (6); General Public (12); Government (1)

Commitments:

Section 7.6.2.4 – Commitment 2D– Anzac Hall – Community Memories

The Memorial will undertake a research project to prepare a representative sample of these memories from designers, veterans and visitors as part of Mitigation Strategy 15 – Public Interpretation to ensure that these public memories are recorded as part of the National Collection and made available to future generations.

Changes:

- Nil

002; 003; 057; 062; 112; 127; 137; 153	S7.3.2	Replacement of existing Anzac Hall – Specific Comment	Beyond the general comments received on the replacement of Anzac Hall, all but one already recognised in the Anzac Hall – General Comment category, eight raised specific issues about the proposed change.	The Memorial has addressed the five specific issues raised individually.
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Community Breakdown

Architectural Community (3); Community Interest Groups (1); General Public (4);

Commitments:

Section 7.6.2.4 – Commitment 2D – Anzac Hall – Community Memories

The Memorial will undertake a research project to prepare a representative sample of these memories from designers, veterans and visitors as part of Mitigation Strategy 15 – Public Interpretation to ensure that these public memories are recorded as part of the National Collection and made available to future generations.

Changes:

- Section 7.3.7** added new sections 4.4.9 – 4.4.12 JPW Masterplan 2017 to the FPD
Additional section in response to public comment on whether the Memorial properly considered the JPW Masterplan 2017 during the design development phase.
- Section 7.3.9** added new section 4.6.6 Moral Rights to the FPD
Added section describing the moral rights consultation process

127; 137	S7.3.3	Restoring views of the Main Building in the round	The Memorial received two public comments regarding restoring views of the Main Building in the round. Both comments disputed the Memorial's interpretation of the term in the round and the Memorial's assessment that the changes were positive in this regard. Both comments also criticised the impact of the glazed link on the ability to view the Main Building from Mount Ainslie.	<p>The Memorial agrees that the term restoring should be changed; this is now described as "activating view of the Main Building in the round".</p> <p>The Memorial has continued design development based on this feedback, in conjunction with comments from the DAWE, to further refine the design and reduce the impact of the Glazed Link on the ability to view the Main Building in the round.</p>
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Community Breakdown

Architectural Community (1); Community Interest Groups (1);

Commitments:

- **Section 7.6.2.5 – Commitment 2E – Activating views in the round of the Main Building**

The Memorial will train its Visitor Services staff and volunteers to ensure they are able to assist visitors to understand and appreciate the importance of the ability to view the Main Building in the round while in the Glazed Link to further maximise the use of the Main Building in this context. By its very nature the Glazed Link will bring more visitors to the back of the building to appreciate its form.

Changes:

- **Section 7.3.18 New Section 5.4.4 Response to Public and DAWE Comments**

Additional section in response to the public's and DAWE's comments on the New Anzac Hall and Glazed Link.

- **Section 7.4.3 Updated Section 7.3.3 Change 2: Restoring Views of the Main Building in the Round**

Added sub-section 7.3.3(a) Activation and Occupied Space to reflect improvements to the ability to appreciate the rear elevation of the Main Building in the round by activating the space within the Glazed Link to attract visitors in to experience the rear of the building, which is a view that is not generally experienced by visitors currently as it is merely a space between buildings.

107; 112; 127	S7.3.4	APH Vista –Glazed Link above the parapet	Three public comments were received regarding this section of the Preliminary Documentation. Each noted, to varying degrees, the impact of the visibility of the Glazed Link above the parapet of the Main Memorial Building and the consequent impacts on the silhouette of the Memorial and on the Parliament House Vista more generally.	<p>The Memorial has accepted this feedback and has modified the proposed Glazed Link to better account for this impact.</p> <p>The Memorial has also consulted extensively with DAWE on these changes to account for comments on this impact.</p>
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Community Breakdown

Community Interest Groups (1); Descendants Community (1); General Public (1)

Commitments:

- **Section 7.6.3.1 Commitment 3A – Fully Reversible Glazed Link**

The Memorial will design, engineer and install a fully reversible Glazed Link design that can be removed without any damage to the Main Building in future if necessary.

Changes:

- **Section 7.2 Change to Attachments** Refer to updated [Attachment H](#) Updated Anzac Hall and Glazed Link Drawings and Renders September 2020 of the FPD

- **Section 7.4.4 Updated Section 7.3.5 Change 4: Parliament House Vista – From Mount Ainslie**

Text updated to reflect changes to the Glazed Link reducing the impact on this vista by more closely following the parapet of the Main Building, thus enabling the form of the Main Building to be maintained from this viewing point.

112; 127; 137	S7.3.5,	APH Vista – from Mount Ainslie	<p>Three submissions commented on the impact of the Glazed Link on the views from Mount Ainslie. These submissions expressed concerns that the ability to perceive the Memorial Main Building as an independent, free standing structure was affected or even eliminated outright by the Glazed Link.</p> <p>One submission notes that the ability to see the cruciform shape of the building in its own right is critical to it delivering cultural meaning as a place of commemoration.</p>	<p>The Memorial has accepted this feedback and has modified the proposed Glazed Link to better account for this impact.</p> <p>The Memorial has also consulted extensively with DAWE on these changes to account for comments on this impact.</p>
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Community Breakdown

Community Interest Groups (1); Descendants Community (1); General Public (1)

Commitments:

- Nil

Changes:

- Section 7.2 Change to Attachments** Refer to updated [Attachment H](#) Updated Anzac Hall and Glazed Link Drawings and Renders September 2020 of the FPD
- Section 7.4.4 Updated Section 7.3.5 Change 4: Parliament House Vista – From Mount Ainslie**
Text updated to reflect changes to the Glazed Link reducing the impact on this vista by more closely following the parapet of the Main Building, thus enabling the form of the Main Building to be maintained from this viewing point.

001; 027; 036; 107; 111; 118; 137; 138; 147; 149; 157;	NEW	Glazed Link – General Comment	<p>The Memorial received 10 submissions relating to the design or impact of the proposed Glazed Link. Of the six supportive submissions four were received from the veterans' community.</p> <p>Criticisms were largely centred on the overall impact of the proposed New Anzac Hall and Glazed Link and the potential for it to 'overwhelm' the Main Building.</p> <p>Support for the design generally recognised the improved connection between the Main Building and the proposed New Anzac Hall and attendant connectivity, circulation and visitation improvements.</p>	<p>Not unusually, opinion is split on whether the changes will be aesthetically pleasing in their own right and whether they have a positive impact on heritage aspects including the Parliament House Vista.</p> <p>The Memorial believes that updated the verbal descriptions and updated visual imagery supplied is of sufficiently high quality, accurately representative of what will be built if approved and provides sufficient viewing angles to allow viewers to make up their own minds on this matter.</p>
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Community Breakdown

Architectural Community (2); Community Interest Groups (1); Descendants Community (4); General Public (3)

Commitments:

- Nil

Changes:

- Section 7.2 Change to Attachments** Refer to updated [Attachment H](#) Updated Anzac Hall and Glazed Link Drawings and Renders September 2020 of the FPD
- Section 7.2 Change to Attachments** Refer to updated [Attachment H5](#) Glazed Link Energy Performance of the FPD

001; 027; 036; 107; 111; 118; 137; 138; 147; 149; 157;	NEW	Glazed Link – Specific Comments	Beyond general comment those not supportive of the Glazed Link design or concept raised several issues: <ul style="list-style-type: none"> a. There is a lack of information or clarity regarding public and service entrances and access connected to the Glazed Link; b. The potential cost or environmental impact of cooling and/or heating the Glazed Link space. c. A number of concerns were raised regarding the use of ethylene tetrafluoroethylene (ETFE) panels for the Glazed Link roofing 	The Memorial has provided a response to each issue: <ul style="list-style-type: none"> a. An additional marked up plan showing access points is provided in Attachment H6; b. An additional attachment outlining the Memorial's energy use mitigation planning is provided; c. Ethylene tetrafluoroethylene (ETFE) is a high strength glazing material used in high-profile projects across Australia and the world. It provides a light weight structure that decreases visual and structural impacts on the adjacent buildings. Additional information on ETFE, including use around the world, is provided to clarify this point.
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Community Breakdown

Architectural Community (2); Community Interest Groups (1); Descendants Community (4); General Public (3)

Commitments:

- Nil

Changes:

- **Section 7.2 Change to Attachments** Refer to updated [Attachment H](#) Updated Anzac Hall and Glazed Link Drawings and Renders September 2020 of the FPD
- **Section 7.2 Change to Attachments** Refer to updated [Attachment H5](#) Glazed Link Energy Performance of the FPD

9.6.1 *Impacts on Heritage Values – Replacement of existing Anzac Hall building – General Comment*

Issue

35 submissions were received on the general theme of the replacement of Anzac Hall. Six were broadly supportive of the proposal while 29 were not. Of the six submissions that identified as veterans to comment on this issue, four were in favour of the replaced Anzac Hall and two, including a former Director of the Memorial, were not.

Supportive submissions acknowledged that the building is not fit for purpose or that, given the need to create more space to the north of the Main Building and ensure new exhibits are connected to the commemorative heart of the Memorial, that the need to tell contemporary veterans' stories in this space was more important than the need to retain the building, despite the heritage loss. Support was also expressed for the improved ability to see the dome of the Hall of Memory and for the improved connectivity between the New Anzac Hall and Main Building offered by the design.

Submissions critical of the replacement of Anzac Hall ranged from gentle disapproval to claims that the proposal was “vandalism beyond belief”, demonstrated a “lack of respect for heritage matters” or was the “profanation of a shrine”. A number of these submissions contained personal attacks and accusations against those involved in the project.

Memorial's Response

The Memorial did not reach the decision to replace the existing Anzac Hall lightly or quickly. The Memorial's Council took close account of heritage impacts but ultimately concluded that it was necessary to replace Anzac Hall in order to ensure the Memorial remains fit for purpose as the centre of national commemoration for the next 50–100 years.

The Memorial has comprehensively described the design decision process and rationale behind this decision through its Preliminary Documentation and believes that it has demonstrated to government and the public that this is the best option for the Memorial on operational, heritage and economic grounds.

The Memorial has demonstrated that it is necessary in order to tell the stories of the current generation of service personnel who have served in recent conflicts and on peacekeeping and humanitarian operations so that all Australians can understand what they and their families, have endured and in many cases continue to endure to keep us safe in a manner befitting their service.

The Memorial has also clearly documented its plan to ensure that the original Anzac Hall is acknowledged as an important part of the Memorial's history and its success in educating visitors to the service of past generations of Australians through three specific mitigation strategies.¹⁹

It is acknowledged that the passionately held views of several submitters will not be satisfied with any response other than the retention of Anzac Hall. The Memorial has explained this process and remains dedicated to providing the best outcome for all Australians, and will continue with our endeavour to deliver the highest value for money and visitor experience possible without negatively affecting the Main Building's heritage façade.

¹⁹ Preliminary Documentation, Mitigation Strategies 13, 14, 15, p.77

Commitment

Section 7.6.2.4 – Commitment 2D – Anzac Hall – Community Memories

The Memorial will undertake a research project to prepare a representative sample of these memories from designers, veterans and visitors as part of Mitigation Strategy 15 – Public Interpretation to ensure that these public memories are recorded as part of the National Collection and made available to future generations.

Change to Preliminary Documentation

Nil

9.6.2 *Impacts on Heritage Values –Replacement of existing Anzac Hall building – Specific Comment*

Issue

Beyond the general comments received on the replacement of Anzac Hall, all but one already recognised in the 'Anzac Hall – General Comment' category, eight raised specific issues about the proposed change.

The Memorial has categorised these issues as follows:

- a. Five (5) submissions expressed concerns that the extant Anzac Hall remained fit for purpose and that the memorial had not considered adaptive re-use of the building seriously enough;
- b. One (1) submission objected to the proposed naming of this building as New Anzac Hall on the basis that the word *Anzac* is over-used;
- c. One (1) submission objected to the proposed copper roof of the New Anzac Hall and suggested it should instead match the existing Main Building roof;
- d. One (1) submission specifically stated the Memorial should work with the original architect of Anzac Hall, Denton Corker Marshall DCM, to find a solution to retain Anzac Hall; and
- e. Two (2) submissions noted that the extant Anzac Hall holds the memories of those who have visited it and that this required closer consideration by the Memorial.

Memorial's Response

- a. The Memorial has since 2006 maintained a 50-year Site Development Plan that considers the long term needs of the Campbell and Treloar sites. The adaptive re-use of Anzac Hall has been a live option since 2014 when Council instructed management to implement the JPW Masterplan 2017 through the Memorial's Corporate Plan 2014–17.

Although the Memorial's Detailed Business Case reference design demonstrated to government that the Memorial could achieve the outcomes laid out in its New Policy Proposal within the agreed budget and timeframe, it is important to note that, at the time, this was only a reference design.

It was not until July 2019 when Council endorsed the Cox Architecture scheme that included the

replacement of Anzac Hall that the Memorial ceased to consider the re-use of this building on the basis that it was not fit for purpose for the long-term future of the Memorial.

This was demonstrated most evidently through the Design Competition where the entry which attempted to retain and expand Anzac Hall proved unable to meet the Memorial's functional design brief requirements due to constraints imposed on usability by the retention of the existing building. The Design Competition Jury noted in its comments: *"Overall the jury noted the design was architecturally and aesthetically pleasing but lacked the required flexibility and logistical capacity to support exhibitions needs over the proposed 50–100 year lifespan of the building."*

As noted elsewhere in this report, the decision to replace Anzac Hall was neither easy nor quick. Rather, the decision was a deliberate and considered evaluation that took into account heritage, innovation, integration, sustainability and more, all within the bounds of government-approved budget and program.

- b. The Memorial decision to name the new northern hall *New Anzac Hall* was part of the Memorial's mitigation strategy to enshrine the history and value of the existing Anzac Hall in the new building. The Memorial believes this is an appropriate heritage outcome and has no plans to consider alternate naming for this building.
- c. The copper roof of the New Anzac Hall serves several purposes, primarily visually and thematically connecting this new structure to the Memorial Main Building's copper clad dome of the Hall of Memory, but also takes up a recommendation from the NCA for the original Anzac Hall in 1999 which recommended "that the roof [of Anzac Hall] should match that of (or be equal to) the roof sheeting of the existing Memorial dome."²⁰

In February 2000, the Australian Heritage Commission wrote to the NCA regarding the roof of Anzac Hall calling for it to be, "a radiating pattern from the centre of the dome, in a way that would reinforce the dominant nature of the Memorial dome and at the same time express visually the radial design geometry of Anzac Hall. Of a quality appropriate for its location on the Parliament House Vista".²¹

This recommendation was taken up in the Memorial's *Heritage Management Plan 2011* and this heritage consideration was an important one in selection of the proposed roof design for the New Anzac Hall which includes a radiating pattern based on the geometry of the dome and a copper roof to meet these recommendations.

- d. The Memorial conducted an open tender process through which Denton Corker Marshall (DCM) had the opportunity to tender for work on any of the project design works, including the development of exhibition space to the north of the Main Building. The Memorial did not receive an expression of interest from DCM for any project works.

²⁰ NCA Submission to Parliamentary Works Committee, extracted from PWC Hansard, Monday 22 November 1999, Anzac Hall extension, Australian War Memorial, p.67

²¹ Letter from Australian Heritage Commission to NCA 17/2/2000, copied to Australian War Memorial

The Memorial notes that it has conducted the required moral rights consultation with DCM regarding Anzac Hall.

- e. The Memorial agrees that the extant Anzac Hall is the repository of the memories of those who have visited since its opening in 2001 including, as noted by one submission, one of Australia's last surviving First World War veterans – Ted Smout – and that this is an important historic and heritage consideration.
- f. Consideration of these connections was undertaken in the Memorial's July 2020 Preliminary Documentation Attachment C Heritage Impact Statement against the National and Commonwealth Heritage Values relating to Significant People and Social Value.

Based on these assessments the Memorial contends that these memories, important though they are, are not more critical to the nation's future social heritage than the telling of the stories of contemporary, and future, veterans and peacekeepers.

Commitments

Section 7.6.2.4 Commitment 2D – Anzac Hall – Community Memories

The Memorial will undertake a research project to prepare a representative sample of these memories from designers, veterans and visitors as part of Mitigation Strategy 15 – Public Interpretation to ensure that these public memories are recorded as part of the National Collection and made available to future generations.

Changes to Preliminary Documentation

Section 7.3.7 added new sections 4.4.9 – 4.4.12 JPW Masterplan 2017 to the FPD

Additional section in response to public comment on whether the Memorial properly considered the JPW Masterplan 2017 during the design development phase.

Section 7.3.9 added new section 4.6.6 Moral Rights to the FPD

Added section describing the moral rights consultation process

9.6.3 *Impacts on Heritage Values – Restoring Views of the Main Building in the round*

Issue

The Memorial received two public comments regarding restoring views of the Main Building in the round. Both comments disputed the Memorial's interpretation of the term *in the round* and the Memorial's assessment that these changes were positive. Both comments criticised the impact of the glazed link on the ability to view the Main Building from Mount Ainslie. This criticism is addressed in Section 9.6.5 of this report.

Memorial's Response

The term *in the round* is typically used in relation to sculpture or other artworks and refers to the ability to perceive a freestanding object from all angles.

Currently this view of the Memorial is only seen by those transiting from one side of the campus to the other, most typically staff and volunteers. Very few visitors view the Main Building in the round from the space between it and the existing Anzac Hall. This is exacerbated by the very limited viewing angles available from the enclosed aerobridge between these buildings which prevents a visitor moving along this route to appreciate the rear of the Main Building – for example, it is impossible to see the dome of the Hall of Memory from anywhere on this bridge.

The Glazed Link, which offers three access points to and from the Main Building and New Anzac Hall and this space, will encourage greater visitation at the ground level and the upper level via the bridge (which will not be enclosed by a solid roof). Together with use of this space as a place for visitors to pause between galleries and for education programs, this ensures that a higher proportion of visitors will see and appreciate the Main Building in the round. The Memorial will train tour guides and visitor services staff to assist visitors to understand and appreciate the importance of this view as part of its visitor engagement program.

The Memorial's description of restoring views in the round is perhaps better expressed as *activating views in the round* and we will update the Final Preliminary Documentation accordingly.

The rationale for the development of the existing Anzac Hall described some of the benefits of better activating this space for visitors:

*On traversing the link between buildings, visitors will be presented with outdoors displays in the landscaped courtyard to one side and the sight of people enjoying refreshments on the café terrace on the other. **They will also be able to see the grandeur of the main building on both sides** and be drawn to the new hall they are entering.*²²

The use of high quality, low reflectivity glass will ensure that visitors who choose not to enter the Glazed Link will be able to view the Main Building clearly from the east and west.

Criticisms regarding changes to the views from Mount Ainslie relating to the Glazed Link are addressed in Section 9.6.5 of this report.

²² Parliamentary Works Committee, PWC Hansard, Monday 22 November 1999, Anzac Hall extension, Australian War Memorial, p.13

It is noted that the revised Attachment D Heritage Impact Statement to the September FPD notes improved heritage outcomes over the original designs.

Commitments

Section 7.6.2.5: Commitment 2E – Activating views in the round of the Main Building

The Memorial will train its Visitor Services staff and volunteers to ensure they are able to assist visitors to appreciate the importance of the ability to view the Main Building in the round while in the Glazed Link. The Glazed Link will bring more visitors to the back of the building to appreciate its form.

Section 7.6.3.1: Commitment 3A – Fully Reversible Glazed Link

The Memorial has committed to a fully reversible Glazed Link design that can be removed without damage to the Main Building in future if necessary.

Changes to Preliminary Documentation

Section 7.3.18 New Section 5.4.4 Response to Public and DAWE Comments

Additional section in response to the public's and DAWE's comments on the New Anzac Hall and Glazed Link.

Section 7.4.3 Updated Section 7.3.3 Change 2: Restoring Views of the Main Building in the Round

Added sub-section 7.3.3(a) Activation and Occupied Space to reflect improvements to the ability to appreciate the rear elevation of the Main Building in the round by activating the space within the Glazed Link to attract visitors in to experience the rear of the building, which is a view that is not generally experienced by visitors currently as it is merely a space between buildings.

9.6.4 *Impacts on Heritage Values – Parliament House Vista - Glazed Link above the Parapet*

Issue

Three public comments were received regarding this section of the Preliminary Documentation. Each noted, to varying degrees, the impact of the visibility of the Glazed Link above the parapet of the Main Memorial Building and the consequent impacts on the silhouette of the Memorial and on the Parliament House Vista more generally. One submission in particular stated that such an impact would be totally unacceptable.

Memorial's Response

The Memorial has accepted this feedback and has modified the proposed Glazed Link to better account for this impact. The Memorial has consulted extensively with DAWE on these changes to account for its comments on this impact. The Memorial undertook the following steps in investigating options:

Options Investigation - Revised Shape of the Glazed Link Roof

Cox Architecture worked with the Memorial to explore a range of potential alternative approaches to the design of the roof of the Glazed Link. This included comparing the original Option 1 – Over Parapet design with:

- Option 2 – Over Parapet with Courtyard (reduced scale glazed link);
- Option 3 – Under Parapet (Glazed Link roof abutting stone façade to keep roof line below parapet);

- Option 4 – Stand Off (minimal connection from main building to new structure); and
- Option 5 – Open Courtyard (with connection between buildings under courtyard).

These options were explored in considerable detail (especially Option 5) to investigate how they could mitigate heritage impacts while delivering on the core objectives of the project and the specific briefed functional requirements.

The options were presented to the Memorial's Corporate Management Group and the Memorial's Council. The Council unanimously rejected the alternatives as they failed to deliver a public gathering space which overtly connects the Main Building with the proposed new work, which is critical to expanding the Memorial in an equitable, legible and functional manner.

Option Investigation - Glass Diagrid in Lieu of ETFE Roof

Cox Architecture was directed to revert to the original concept and proceed with exploring refinements to the original Glazed Link concept. A glass diagrid akin to the British Museum's atrium was revisited as an option, but on further analysis this was found to be:

- too heavy, imposing larger loads on the Main Building;
- less transparent due to the heavier structure; and
- less thermally efficient, and not likely to comply with BCA Section J energy efficiency requirements.

Refinement of the Preferred ETFE Solution

The Glazed Link design with ETFE roof has therefore been reviewed, amended and refined to optimize its configuration and absolutely minimise its physical and visual impact within the practical limits of the defined project and functional requirements, and leading building technology.

The form and detailing of the Glazed Link have been revised to ensure it will be fully reversible without permanent impact to significant heritage fabric, especially the stone façade facing and other façade elements. It is important to note that achieving this reversibility requires the retention of the strategy of taking the Glazed Link roof over the relevant parapets and supporting the new roof through the metal roof to the existing roof slab/structure underneath. It is not possible to create a wholly reversible structure if the roof is lowered so that it directly abuts against and is supported by the stone clad parapets and masonry; due to the need to cut in flashings and structural supports, this would significantly increase physical impact to the heritage fabric, especially to the stone facing.

Improvements Made Through the Refinement Process

Amendment of the roof outline has also allowed the step to the higher parapet to occur further north, and the southern edge of the roof to be held at a generally lower level, lowering the springing points of the roof trusses. The curvature of the trusses has also been reduced to the flattest possible roof while ensuring it will drain adequately. These initiatives in concert lower the maximum height of the roof crest by 600mm, and which means the roof cannot be first be read from Anzac Parade until one is at approximately 500m from the Dome, an additional 130m from the previously submitted iteration. One must be 900m away before a section of roof 1m high becomes visible. As the view line photomontages

prepared clearly demonstrate, the visual impact on this vista will be virtually imperceptible to the naked eye, and therefore insignificant.

The revised Attachment D Heritage Impact Statement of the FPD notes improved heritage outcomes over the original designs.

Commitment

Change 7.6.3.1: Commitment 3A – Fully Reversible Glazed Link

The Memorial will design, engineer and install a fully reversible Glazed Link design that can be removed without damage to the Main Building in future if necessary.

Changes to Preliminary Documentation

Section 7.2 Change to Attachments Refer to updated Attachment H Updated Anzac Hall and Glazed Link Drawings and Renders September 2020 of the FPD

Section 7.4.4 Updated Section 7.3.5 Change 4: Parliament House Vista – From Mount Ainslie

Text updated to reflect changes to the Glazed Link reducing the impact on this vista by more closely following the parapet of the Main Building, thus enabling the form of the Main Building to be maintained from this viewing point.

9.6.5 *Impacts on Heritage Values – Parliament House Vista – From Mount Ainslie*

Issue

Three submissions commented on the impact of the Glazed Link on the views from Mount Ainslie. These submissions expressed concerns that the ability to perceive the Memorial Main Building as an independent, free standing structure was affected or even eliminated outright by the Glazed Link. One submission notes that the ability to see the cruciform shape of the building in its own right is critical to it delivering cultural meaning as a place of commemoration.

Memorial's Response

The Memorial has accepted this feedback and has modified the proposed Glazed Link to better account for this impact.

The Memorial has also consulted extensively with DAWE on these changes to account for its comments on this impact.

A description of the changes is provided in Section 9.6.4 Impacts on Heritage Values – Parliament House Vista - Glazed Link above the Parapet above. The revised [Attachment D](#) Heritage Impact Statement of the FPD notes improved heritage outcomes over the original designs.

Commitment

Nil

Changes to Preliminary Documentation

Section 7.2 Change to Attachments Refer to updated [Attachment H](#) Updated Anzac Hall and Glazed Link Drawings and Renders September 2020 of the FPD

Section 7.4.4 Updated Section 7.3.5 Change 4: Parliament House Vista – From Mount Ainslie

Text updated to reflect changes to the Glazed Link reducing the impact on this vista by more closely following the parapet of the Main Building, thus enabling the form of the Main Building to be maintained from this viewing point.

9.6.6 *Glazed Link – General Comment*

Issue

The Memorial received 10 submissions relating to the design or impact of the proposed Glazed Link. Of the six supportive submissions four were received from the veteran community.

Criticisms were largely centred on the overall impact of the proposed New Anzac Hall and Glazed Link and its potential to overwhelm the Main Building. In a number of cases the design was criticised as insufficiently subservient to the Main Building, further this was specifically contrasted to the existing Anzac Hall in several comments.

Support for the design generally recognised the improved connection between the Main Building and the proposed New Anzac Hall and attendant connectivity, circulation and visitation improvements. Several supportive submissions noted the success of similar courtyards in other museums or heritage buildings.

The Memorial notes that other criticism of the impact on the heritage vistas has been addressed in Section 9.6.4 and 9.6.5 of this report and that the changes resulting from this will help to mitigate concerns about the proposed design being insufficiently subservient to the Main Building.

Memorial's Response

Not unusually, opinion is split on whether the changes will be aesthetically pleasing in their own right and whether they have a positive impact on heritage aspects including the Parliament House Vista.

The Memorial believes that the verbal descriptions and updated visual imagery supplied is of sufficiently high quality, accurately representative of what will be built if approved and provides sufficient viewing angles to allow viewers to make up their own minds on this matter.

Commitment

Nil

Changes to preliminary Documentation

Section 7.2 Change to Attachments Refer to updated [Attachment H](#) Updated Anzac Hall and Glazed Link Drawings and Renders September 2020 of the FPD

9.6.7 *Glazed Link – Specific Comment*

Issue

Beyond general comment those not supportive of the Glazed Link design or concept raised several issues:

- a. There is a lack of information or clarity regarding public and service entrances and access connected to the Glazed Link;
- b. The potential cost or environmental impact of cooling and/or heating the Glazed Link space; and
- c. A number of concerns were raised regarding the use of ethylene tetrafluoroethylene (ETFE) panels for the Glazed Link roofing including:
 - i. Material is inappropriate at the Memorial as this material is more typically associated with use in sporting stadia or shopping centres;
 - ii. The failure of the ETFE panels may damage museum objects on display;
 - iii. The cost or difficulty of cleaning ETFE; and
 - iv. The ETFE roof is not completely transparent and this may impair the ability to view the dome of the Hall of Memory from within the area and in turn reduce the ability to view the building in the round.

Memorial's Response

- a. The Memorial accepts this comment and will provide an additional marked-up drawing to demonstrate public and service access points for the New Anzac Hall and Glazed Link.
- b. The Glazed Link is being carefully designed to ensure the development achieves Section J (Energy Efficiency) 2019 compliance of the National Construction Code. At project completion the Glazed Link will represent only 4% of total site energy consumption.

The design includes use of an energy-efficient CEP for the entire site and making the maximum use of both passive heating and passive cooling in the Glazed Link itself. Other design elements, such as the use of efficient in-slab hydronic heating, have also been included to reduce costs.

The operational (energy) costs of the Glazed Link are estimated at \$70,000 p.a. including heating, cooling and lighting. Some 60% of this cost, or \$40,000 p.a., comes from heating with energy usage estimated at 312,000 kW/h p.a.

To offset this, the Memorial has proposed a rooftop photovoltaic system for the existing Bean Building and Research Centre and CEP roofs. The indicative size of this system at this stage is expected to generate in the order of 300,000 kWh per year which effectively offsets the heating cost energy usage associated with the Glazed Link.

The Memorial has sought detailed advice on this question from the Project consultant team; the Memorial will update its Final Preliminary Documentation to include this advice as Attachment H5 Glazed Link Energy Performance to the FPD.

- a. Ethylene tetrafluoroethylene (ETFE) is a high strength glazing material used in high-profile projects across Australia and the world. It provides a light weight structure that decreases visual and structural impacts on the adjacent buildings.

In recent years ETFE has been used in a number of high profile and award winning projects. Australia's first carbon neutral building the University of Queensland Global Change Institute, designed by Hassell Architects, uses ETFE as a key part of its environmental sustainability and roofing systems while cultural use in the cultural and government sector is on the rise including the UK's National Space Centre, the Curtis R Priem Experimental Media and Performing Arts Centre in New York and the Australian Embassy in Indonesia.

A comparison of ETFE versus glass is provided below across key areas:

ELEMENT/ CHARACTERISTIC	ETFE	GLASS (STATIC TINT OR THERMOCHROMIC)
Structure	Light weight of the membrane when compared to glass provides approximately 50% reduction in structural support requirement.	Approximately double that of ETFE. Diagrid structure was the original concept due to structural efficiency, but required columns.
Durability	Material has been shown to not degrade over a period of more than 35 years so very stable and robust. No issues with bird attack in Australia. Will not shatter or fall, deflates instead minimising danger to persons in Glazed Link of any failure.	Durable but brittle so can crack or shatter, including due to thermal stress. Unlikely to completely fail and fall out due to interlayers. May shatter or fall in event of failure.
Cleaning	ETFE is chemically very similar to Teflon and provides similar self-cleaning properties in conjunction with rainfall, or can be cleaned with a simple hose spray.	Will need to be regularly cleaned to remove dust and maintain clarity.
Access	Can be walked on for service access with suitable care.	Can be walked on for service access with suitable care.
Repairs	ETFE foil is robust and should not, under normal circumstances, puncture or rip. Holes can be repaired relatively easily using repair tape. Significant holes (>250mm long) may require panel replacement. Replacement panels can be installed without significant disruption to operations.	Damaged panels would need wholesale replacements.
Fire	Will be certified via an alternative fire engineered solution including assessment of ember attack and other bushfire considerations.	Generally non-combustible depending on specific characteristics of any interlayers.
Acoustics	Light weight means it is effectively absorptive from within the space which is advantageous in enclosed courtyard.	Glass being a hard and relatively massive material contributes to sound reverberation internally so will need acoustic absorption to counteract this.

ELEMENT/ CHARACTERISTIC	ETFE	GLASS (STATIC TINT OR THERMOCHROMIC)
SHGC (g value) (Solar heat gain, the lower this value the less heat transmitted)	Can generally achieve an average of around 0.25 but may be customised to achieve 0.15 while retaining transparency. May also be varied by operable pillows/frits on the foil.	Up to 0.11 achievable at full tint for Thermochromic. High performance static tinted glass options achieve around 0.16 to 0.13.
Transparency	Typically relies on printed frits to achieve SHGC, so this impacts perceived transparency noting a fine frit in effect reads to the eye as a tinted membrane from a reasonable distance. The reduced structure needed for ETFE enhances transparency of the overall assembly.	Glass darkens in response to light levels and heat, but remains transparent, especially from the internal space when it is brighter outside than inside. Structure to support glass is generally heavier and panels are smaller, so structure impacts overall transparency.
UV Screening	UV screening layer(s) can be included to vary UV transfer from 9-18%.	Glass generally screens most UVB.
Sustainability	100% recyclable. Lower CO2 and other emissions during production.	Generally recyclable.

As this comparison demonstrates ETFE offers a number of advantages over traditional glass including reduced maintenance and cleaning requirements, improved thermal performance, better UV protection with reduced loss of transparency and, unlike glass, individual panels can easily be patched or replaced.

For the Memorial's intended purpose it is critical that ETFE allows for a much lighter supporting structure than glass that will greatly increase the view of the Main Building, especially the dome of the Hall of Memory. This difference is highlighted by the concept drawings below.

ETFE also offers acoustic advantages that will be particularly important in allowing the Memorial to use this space for education and public programs.

In sum, these qualities make it ideal for use in the Memorial's proposed Glazed Link.

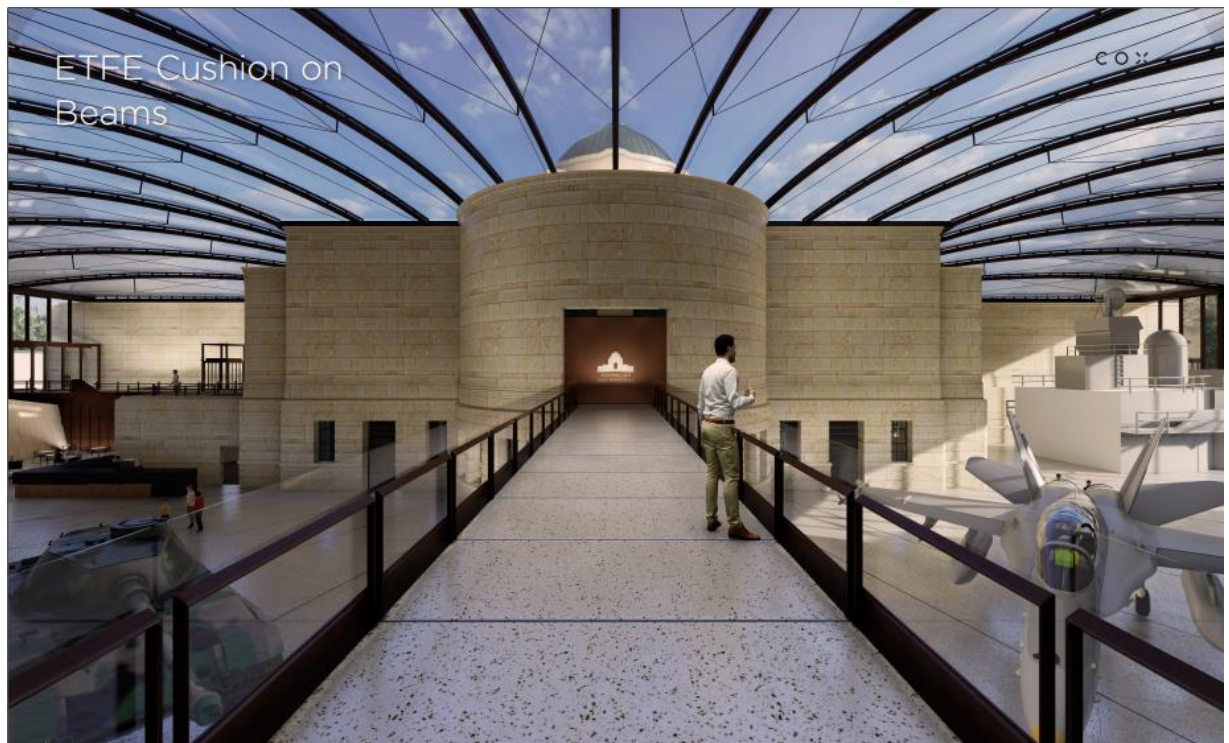


Image 2: ETFE based Glazed Link

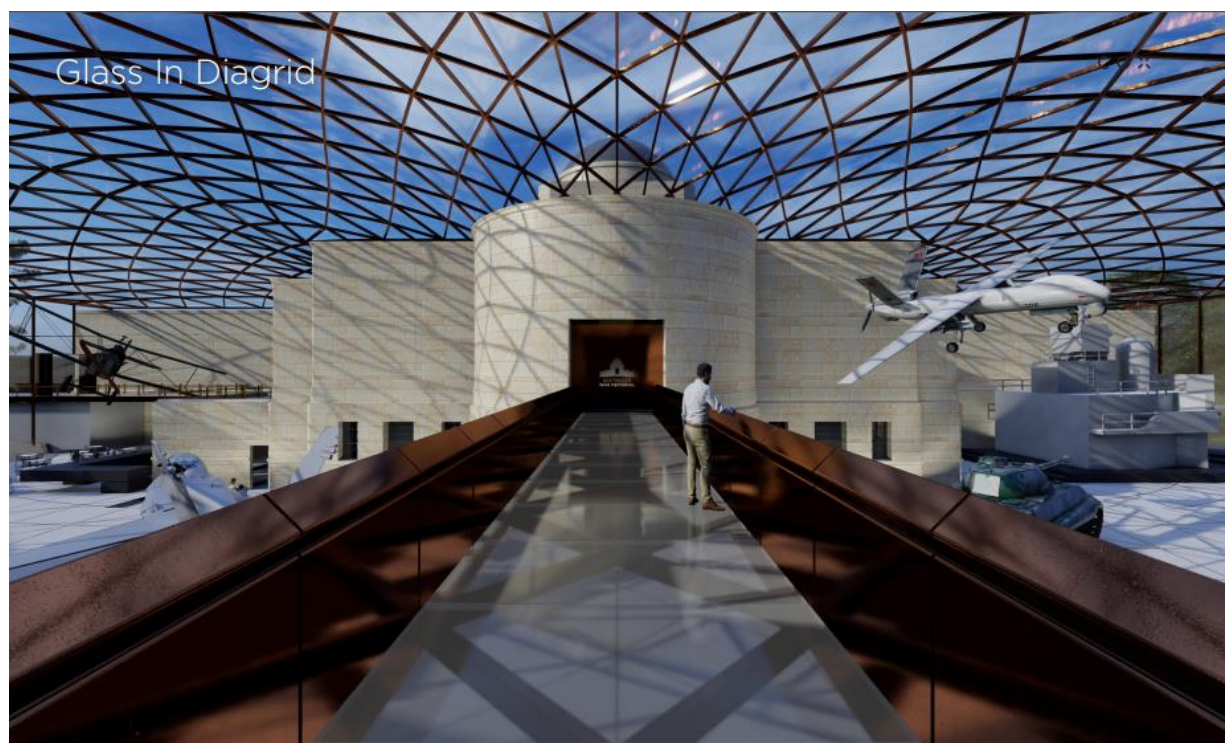


Image 3: Glass based Glazed Link

Specific concerns raised in submissions are addressed below:

- i. The New Anzac Hall and Glazed Link design lead, Cox Architecture, have recent experience in the use of ETFE in a number of projects within Australia.

The Memorial notes again the growing sophistication of ETFE use as an architectural material and feature including the UK's National Space Centre, the Curtis R Priem Experimental Media and Performing Arts Centre in New York and the Australian Embassy in Indonesia.

- ii. The ETFE roofing system for the Glazed Link is designed with multiple foil layers within each cushion reducing the likelihood of total failure and potential damage to people or objects in the Glazed. ETFE foils also provide an advantage over glass is not falling or shattering in the event of failure but rather deflating. Unlike glass ETFE panels can be patched or replaced in situ with relative ease meaning that in the event of failure the return to business as usual operation will be quick and easy.
- iii. The Memorial will only display suitably robust objects in the Glazed Link in accordance with its Gallery Master Plan and the principles contained within its Collection Management Strategy. The ETFE installation will also be delivered with suitable light reduction and UV protection systems to minimise light related fatigue for objects on display to ensure appropriate protection of the National Collection.
- iv. ETFE panels are chemically similar to Teflon and provide similar self-cleaning capabilities. ETFE structures typically require external cleaning every three years and, as a fully enclosed space, internal cleaning will likely be required at approximately 10 year intervals.

Advice from the Memorial's design team confirms that ETFE is likely to be less expensive to maintain/clean than an equivalent sized glass roof.

Commitments

Nil

Change to Preliminary Documentation

Section 7.2 Change to Attachments Refer to updated Attachment H Updated Anzac Hall and Glazed Link Drawings and Renders September 2020 of the FPD

Architectural commentary and updated plan and renders detailing changes made in response to this feedback.

Section 7.2 Change to Attachments Refer to updated Attachment H5 Glazed Link Energy Performance of the FPD

9.7 Section 7.4 of Preliminary Documentation - Impacts on Heritage Values Bean Building Extension and Research Centre

The Memorial categorised the public comment regarding Section 7.4 of the Preliminary Documentation, Impact on Heritage Values –Bean Building Extension and Research Centre into two themes.

SUBMISSION(S)	PD	THEME	ISSUE SUMMARY	RESPONSE SUMMARY
Supportive: 027; 031; 082; 097 Not supportive: 112; 127; 137; 152;	S7.4	Bean Building and Research Centre – General Comment	The Memorial received eight submissions relating to the design or impact of the proposed Bean Building extension and Research Centre. Of these four were supportive and four were not.	Not unusually opinion is split on whether the changes will be aesthetically pleasing in their own right and whether they have a positive impact on heritage aspects of the site. The Memorial believes that the verbal descriptions and visual imagery supplied is of sufficiently high quality, accurately representative of what will be built if approved and provides sufficient viewing angles to allow viewers to make up their own minds on this matter.

Community Breakdown

Supportive: Defence Family (1); General Public (2); Veteran (1)

Not Supportive: General Public (1); Architectural Community (1); Community Interest Group (1); Government (1)

Commitments:

- Nil

Changes:

- **Section 7.2 Change to Attachments** Refer to updated [Attachment I](#) Updated Bean Building Extension and Research Centre Drawings and Renders September 2020 of the FPD
The Memorial has continued detailed design throughout the public comment period; changes are reflected in these updated attachments.

103; 152	NEW	Bean Building and Research Centre – Impact on Eastern Precinct	Two submissions were critical of a perceived lack of consideration for the impact of the Project on the Eastern Precinct.	The very minor impacts on the Eastern Precinct were examined in detail in the July 2020 Preliminary Documentation Attachment C Heritage Impact Statement.
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Community Breakdown

Architectural Community (1); Government (1)

Commitments:

- **Section 7.6.4.1: Commitment 4A – Tree Layouts**
The Memorial will agree the tree layout solution for each public realm area with the NCA in order to ensure an appropriate landscape character is maintained.
- **Section 7.6.4.3: Commitment 4C – Landscape – Heritage Impact Assessments**
The Memorial will undertake a heritage impact assessment of landscape designs at detailed design stage including consultation with the NCA and assessment by a heritage landscape architect to agree final design outcomes.

Changes:

- **Section 7.2 Change to Attachments** Refer to updated [Attachment I](#) Updated Bean Building Extension and Research Centre Drawings and Renders September 2020 of the FPD
The Memorial has continued detailed design throughout the public comment period; changes are reflected in these updated attachments.
- **Section 7.2 Change to Attachments** Refer to [Attachment D](#) Heritage Impact Statement of the FPD
Updated Heritage Impact Statement following design detail changes in response to public and DAWE feedback including the protected vistas.

9.7.1 *Bean Building and Research Centre – General Comment*

Issue

The Memorial received eight submissions relating to the design or impact of the proposed Bean Building extension and Research Centre. Of these, four were supportive and four were not.

In general, supportive comments centred on an appreciation for the design and its placement within the landscape and/or Eastern Precinct with comments describing the changes as “in keeping with the original design”²³ or “designed sensitively and in keeping with the essential emotional character of the building”²⁴ and for the provision of improved facilities for records management and researchers.

Comments critical of this element of the project cited concerns that the increased size of the Bean building, especially to the south rather than the east, “challenges the primacy of the Main Building”²⁵ or that this change reduces the sense of isolation of the Main Building in the landscape.

The change in view from the existing Eastern Precinct, in particular from the Poppy’s Café site, to the Main Building was also cited as problematic in one submission with the southern extension of the Bean Building perceived as encroaching upon the design intent of the siting of the café in this location to provide views of the dome of the Hall of Memory.

The formalisation of the landscape of the Eastern Precinct and the perceived detrimental impact of this on the Campbell site was also criticised in two submissions.

Memorial’s Response

Not unusually opinion is split on whether the changes will be aesthetically pleasing in their own right and whether they have a positive impact on heritage aspects of the site.

The renders showing the visibility of the dome of the Hall of Memory from the Research Centre reading rooms and courtyard areas reinforce the connection to the dome now presented from the four sides of the Memorial.

The Memorial believes that the verbal descriptions and visual imagery supplied is of sufficiently high quality, accurately representative of what will be built if approved and provides sufficient viewing angles to allow viewers to make up their own minds on this matter.

Commitment

Nil

Changes to Preliminary Documentation

Section 7.2 Change to Attachments Refer to updated [Attachment I](#) Updated Bean Building Extension and Research Centre Drawings and Renders September 2020 of the FPD

The Memorial has continued detailed design throughout the public comment period; changes are reflected in these updated attachments.

²³ Submission 027, Descendant Community

²⁴ Submission 031, General Public

²⁵ Submission 127, Community Interest Group

9.7.2 *Bean Building and Research Centre – Impact on Eastern Precinct*

Issue

The Memorial received two submissions, including one from the Australian Heritage Council (AHC), relating to the impact of the proposed Bean Building extension and Research Centre on Eastern Precinct. Both were critical of a lack of consideration of the impact of the Project on this area of the Campbell Precinct.

Memorial's Response

The Memorial acknowledges that the impact on the Eastern Precinct was not summarised in the Preliminary Documentation. The impact of the project on the Eastern Precinct has however been reviewed in detail by Hector Abrahams Architects in the July 2020 Preliminary Documentation *Attachment C Heritage Impact Statement*²⁶ as part of the documentation made available to the public.

Based on the advice that excepting the minor exception of the loss of two *Eucalyptus melliodora* trees the Project complied with, and had no detrimental impact on, the heritage management of the Eastern Precinct, the Memorial did not highlight any impacts in its Preliminary Documentation as the documentation is focussed on those heritage values that are likely to be impacted. The Memorial's intention was to make it as readable as possible for the lay person.

The Memorial notes that the specific concern of the AHC regarding the balance between architectural and landscape components has been addressed in the HIS²⁷ which concluded that the juxtaposition between these components was maintained.

Based on advice from its heritage architects, landscape architect and the Lyons Architecture as lead designer for the Bean Building, the Memorial does not agree with the assessment of the AHC that this balance is considerably impacted. This balance will be maintained through the use of new native to the ACT plantings and the retention of a mix of formal landscape (including grass lawn and box plantings) in a similar fashion to the existing Building landscape environment.

Noting that, as it cannot be progressed until architectural design is finalised, landscape design is currently no further advanced than concept design and there remains a large degree of scope to refine the mix of formal and native landscaping elements across not only the Eastern Precinct but the entire Campbell site. The Memorial believes that through this process any concerns over landscape balance will be addressed.

Commitments

Change 7.6.4.1: Commitment 4A – Tree Layouts

The Memorial will agree the tree layout solution for each public realm area with the NCA in order to ensure an appropriate landscape character is maintained.

²⁶ Table 7.5 Landscape – Eastern Precinct section, p.54-56, July 2020 Preliminary Documentation Attachment C Heritage Impact Statement, Hector Abrahams Architects, July 2020 PD

²⁷ Table 7.5 Landscape – Eastern Precinct; Policy 1.4.1, p.55, July 2020 Preliminary Documentation Attachment C Heritage Impact Statement, Hector Abrahams Architects, July 2020 PD

Change 7.6.4.3: Commitment 4C – Landscape – Heritage Impact Assessments

The Memorial will undertake a heritage impact assessment of landscape designs at detailed design stage including consultation with the NCA and assessment by a heritage landscape architect to agree final design outcomes.

Changes to Preliminary Documentation

Section 7.2 Change to Attachments Refer to updated Attachment I Updated Bean Building Extension and Research Centre Drawings and Renders September 2020 of the FPD

The Memorial has continued detailed design throughout the public comment period; changes are reflected in these updated attachments.

Section 7.2 Change to Attachments Refer to Attachment D Heritage Impact Statement of the FPD

Updated Heritage Impact Statement following design detail changes in response to public and DAWE feedback including the protected vistas.

9.8 Section 7.5 of Preliminary Documentation - Impacts on Heritage Values Public Realm

The Memorial categorised the public comment regarding Section 7.5 of the Preliminary Documentation into the following three themes.

SUBMISSION(S)	PD	THEME	ISSUE SUMMARY	RESPONSE SUMMARY
036; 127; 137; 138; 152; 153; 156	S7.5	Public Realm – General Comment	Seven submissions made comment on the Public Realm in general. The major concerns were the perception of formalisation of landscape elements across the site, impacts of climate change and lack of consultation with the NCA on public realm matters,	<p>The Memorial has appointed expert landscape architects to provide Public Realm advice to ensure the retention natural landscape character across the site and on climate change issues.</p> <p>The Memorial has consulted extensively with the NCA including 3 presentations to the Board and inclusion of NCA members on an oversight committee for the project.</p>

Community Breakdown

Community Interest Group (2); Architectural/Heritage Community (3); Government (1); General Public (1)

Commitments:

- **Section 7.6.4.1: Commitment 4A – Tree layouts**
The tree layout solution for each work area will be agreed with the NCA in order to ensure an appropriate landscape character is maintained.
- **Section 7.6.4.2: Commitment 4D – Landscape Climate Advice**
The Memorial will develop and implement an appropriate mitigation strategy to manage the impact of climate change on landscape elements of the project.
- **Section 7.6.2.6: Commitment 2F – National Capital Authority Approvals**
The Memorial will undertake all required NCA planning approvals required for the Project following relevant PWC and EPBC approvals.

Changes:

- Nil

036; 127; 135; 138	S7.5.2	Public Realm – Parade Ground Orientation	Four submissions expressed specific concerns with the proposed Parade Ground re-orientation on the basis that the change was unnecessary or detrimental.	<p>The Memorial acknowledges that, not unusually, views on the changes to the Parade Ground vary including the opinions proffered through these comments that view the changes as less preferable to current arrangements.</p> <p>The Memorial has consulted with relevant stakeholders and authorities as part of this proposed design change and believe it to be the best outcome for the project and the Memorial.</p>
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Community Breakdown

Not Supportive: Community Interest Group (2); Architectural/Heritage Community (1);

Commitments:

- Nil

Changes:

- **Section 7.2 Change to Attachments** Refer to [Attachment J](#) of the FPD with updated Public Realm concept design

127; 152; 153	NEW	Public realm – Cumulative Impact	Three submissions expressed concerns that the Preliminary Documentation did not adequately consider the cumulative impact of the overall project on the nature and character of the Campbell site or that there was insufficient detail on public realm plans to properly assess this impact.	<p>The individual impacts of landscape changes are considered and assessed in the July 2020 Preliminary Documentation Attachment C Heritage Impact Statement as prepared by Heritage Abrahams Architects.</p> <p>The overall assessment of these items as contained in the HIS is that the landscape changes across the site are generally sympathetic to and appropriate for the Memorial's Campbell precinct but note that particular care should be taken with the Eastern Precinct to achieve appropriate outcomes.</p>
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Community Breakdown

Community Interest Group (1); Architectural/Heritage Community (1); Government (1)

Commitments:

- **Section 7.6.4.3: Commitment 4C – Landscape – Heritage Impact Assessment**

The Memorial will undertake a heritage impact assessment of landscape designs at detailed design stage including consultation with the NCA and assessment by a heritage landscape architect to agree final design outcomes.

- **Section 7.6.2.8: Commitment 2H – Unit Memorial Plaques**

The Memorial will conduct a heritage impact assessment of any plaques that require relocation in accordance with its *Heritage Management Plan 2011*. The Memorial will work with key stakeholders for any affected plaque to agree a new location and undertake a dedication ceremony for any relocated plaques if desired by stakeholders.

Changes:

- **Section 7.2 Change to Attachments** Refer to [Attachment D](#) Heritage Impact Statement of the FPD

Updated Heritage Impact Statement following design detail changes in response to public and DAWE feedback

9.8.1 *Public realm – General Comment*

Issue

Seven submissions made comment on the Public Realm in general raising a number of common issues:

- a. The hardening or formalisation of landscape across the site will detract from the natural landscape environment in which the Memorial sits as the dominant built element;
- b. Additional detail on proposed landscape plantings should be provided, one submission called for these details to demonstrate a better assessment of future landscape needs in a climate change affected Australia; and
- c. The Memorial has not demonstrated adequate consultation with the National Capital Authority in relation to the impact of the landscape changes on the broader landscape of Canberra or on Anzac Parade and the Burley-Griffin Land Axis.

Memorial's Response

- a. The Memorial notes these concerns and has highlighted the necessity of not changing the nature of the Campbell site landscape through the project to all the design teams including the specialist landscape architects appointed earlier in 2020.

The overall impact of the planned changes is laid out in the Preliminary Documentation Section 6.3 Impacts on plants. Table 6.1 shows that there will be an approximate gain of 50 trees across the Campbell site and that, importantly, these will be of a variety endemic to the ACT rather than imported varieties. Similar care will be taken with other plantings across the site.

The Memorial believes that, together with the existing protocol where major landscaping changes on the Campbell site are agreed with the NCA, these additional trees will ensure the Memorial retains, and even improves, its current natural landscape characteristics.

- b. The Preliminary Documentation provides landscape architecture design at a concept design level rather than detailed design as this design work will naturally be influenced by any other changes to the scheme agreed through the EPBC process and future approvals from the NCA. The Memorial believes that the detail provided is sufficient to the intent of the scheme to allow viewers to judge the landscape impacts of the proposed changes.

This is not an unusual process and, as such works will be subject to a thorough approvals process once detailed design is resolved, the Memorial considers that any associated risks will be appropriately mitigated.

The Memorial will mitigate landscape risks associated with climate change issues through the expert advice of its landscape architects and supporting consultants to ensure that all landscape works that are delivered are suitable for the current and likely future climate conditions.

- c. The Memorial has engaged with the NCA in relation to the Project extensively since 2018. This includes both presentations of major design milestones to the NCA Board and the inclusion of the ACT Chief Planner on two inter-departmental groups overseeing the project.

In accordance with approvals processes, once the Memorial secures PWC and EPBC approvals the project will then be considered formally by the NCA. We expect a full and comprehensive design review will be carried out between our designers and the NCA assessors.

The table below outlines the key consultation with the NCA on the project to date.

<i>National Capital Authority (NCA) Consultation</i>		
NCA appointed to Interdepartmental Steering Committee for Development Project Detailed Business Case	April 2018 to November 2018	NCA Chief Planner appointed as NCA representative Six (6) monthly meetings held; NCA represented at 5
NCA appointed to Interdepartmental Advisory Committee for Development Project delivery	May 2019 – Ongoing	NCA Chief Planner appointed as NCA representative Seven (7) meetings held; NCA represented at 6; meetings ongoing quarterly
<i>NCA Board Presentations</i>		
a. Project Update Presentation	August 2018	Specifically conducted following Australian War Memorial Council decision on designs and prior to public announcement in November 2018
b. Project Update Presentation	October 2019	Specifically conducted prior to EPBC Referral submission and public comment
c. Project Update Presentation	June 2020	Specifically conducted prior to PWC and EPBC submission and public comment periods

Commitment

Section 7.6.4.1: Commitment 4A – Tree layouts

The tree layout solution for each work area will be agreed with the NCA in order to ensure an appropriate landscape character is maintained.

Section 7.6.4.2: Commitment 4B – Landscape Climate Advice

The Memorial will develop and implement an appropriate mitigation strategy to manage the impact of climate change on landscape elements of the project.

Section 7.6.2.6: Commitment 2F – National Capital Authority Approvals

The Memorial will undertake all required NCA planning approvals required for the Development Project following relevant PWC and EPBC approvals.

Changes to Preliminary Documentation

Nil

9.8.2 *Public Realm – Parade Ground Orientation*

Issue

Four submissions expressed specific concerns with the proposed Parade Ground re-orientation on the basis that the change was unnecessary or detrimental. Particular concern was raised over:

- a. The perception that changes to the Parade Ground narrow the focus of the land axis down the line of Anzac Parade rather than the broader land axis encompassed by the current radial arrangement of the Parade Ground that encourages a wider interpretation of the views or that the change will no longer gently transition the viewer from Anzac Parade to the Stone of Remembrance and thence the Memorial; and
- b. Whether sufficient consideration had gone into the impact the more formal Parade Ground arrangement would have on the landscape of the site day to day and not just how it will be utilised for the two major national ceremonies held on the Parade Ground each year.

Memorial's Response

- a. The Memorial acknowledges that, not unusually, views on the changes to the Parade Ground vary including the opinions proffered through these comments that view the changes as less preferable to current arrangements.

The Memorial notes that the original configuration of the Parade Ground in 1941 was rectilinear and that the total gravelled surface area of the proposed design is not substantially increased from the existing isosceles trapezoid form. The Memorial believes that these changes are positive, particularly the return to a 1941 style parade ground form.

In response to specific concerns around the increased size of the parade ground the Memorial has undertaken further detailed design and resolved to reduce the parade gravel area by 3m in the north / south direction. The area of overall gravel is now near equivalent to the existing gravel area. The length of the sandstone terraces has also been reduced, with the lower terrace now ending in line with the grass and the upper rows reduced back accordingly. More (temporary) informal seating on the grassed area will be utilised for commemorative events.

The figure below shows the July 2020 (top) and September 2020 (bottom) parade ground designs, the changes are highlighted in red in the middle image. Larger images are provided in the Final Preliminary Documentation.

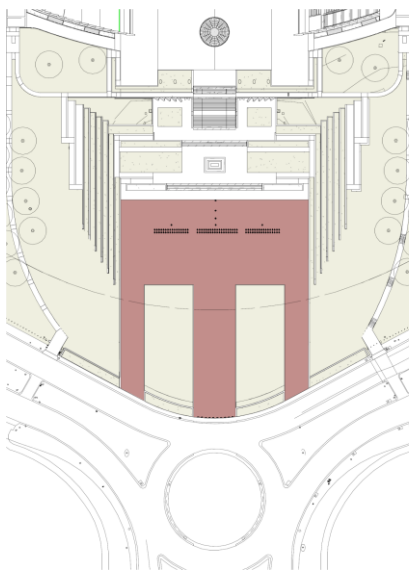
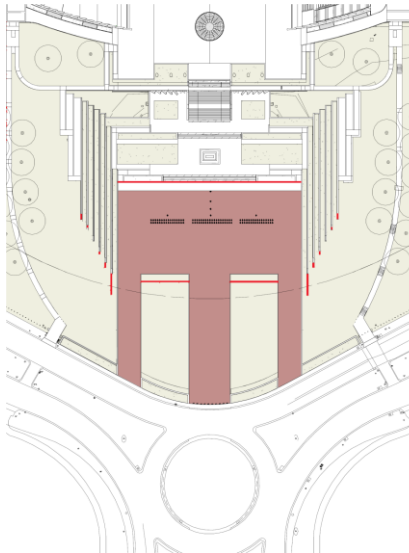
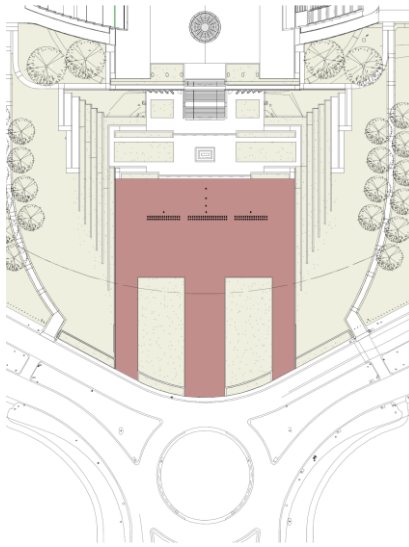


Figure 4: Parade Ground design resolution

- b. The Memorial has given extensive consideration to the likely ceremonial requirements of the Parade Ground over the decades to come and day to day operational requirements as well as other matters such as future landscape maintenance costs, sustainability and security.

This has relied upon both the expertise of the relevant consultants including landscape architects, arborists and ecologists²⁸ as well as its own internal experts in buildings and grounds maintenance, security and ceremonies, events and protocols. This has included extensive user group meetings and reviews of key plans and documents to reach an agreed design.

The Memorial has also consulted with other stakeholders such as the Australian Defence Force (ADF) and the Returned and Services League (RSL) on the proposed changes to the Parade Ground.

Further, the Memorial has engaged with DAWE and the NCA through the design and approvals process on this matter. The Memorial will naturally seek formal NCA approval for any changes to the Parade Ground once a design has passed the relevant PWC and EPBC gateways.

Commitment

Nil

Changes to Preliminary Documentation

Section 7.2 Change to Attachments Refer to Attachment J of the FPD with updated Public Realm concept design

²⁸ See Preliminary Documentation S8 Heritage and Environment Mitigation Measures, Mitigation Strategy 10 – Engage Appropriate Advice, p.76

9.8.3 *Public Realm – Cumulative Impact*

Issue

Three submissions expressed concerns that the Preliminary Documentation did not adequately consider the cumulative impact of the overall project on the nature and character of the Campbell site or that there was insufficient detail on public realm plans to properly assess this impact. In particular commenters expressed concern that:

- a. Additional formalisation or linear arrangements of hardscape elements (roads, paths etc.), along with the increased built elements (Anzac Hall, the Glazed Link and Bean Building extension in particular) could cumulatively harden or formalise the entire site. Concern was expressed at potential cumulative impacts from the two major viewing points on the land axis (Parliament and Mount Ainslie) of the changes to the overall landscape of the site in particular;
- b. One submission expressed further concern on the impact on the Western Precinct, especially commemorative plaques laid there, resulting from proposed changes to the pedestrian paths in this area. This submission expressed particular concern that the Memorial has not properly considered the potential loss of heritage values associated with these plaques as many were laid in the presence of veterans and many of these, especially from the Second World War, have now passed on; and
- c. One submission queries whether the Memorial has engaged a heritage landscape architect in accordance with the recommendation contained in Preliminary Documentation Attachment C Heritage Impact Statement, Section 6.

Memorial's Response

- a. The individual impacts of landscape changes are considered and assessed in Preliminary Documentation *Attachment C Heritage Impact Statement* as prepared by Heritage Abrahams Architects. The changes were assessed individually at the following points:
 - i. New landscape works and features (including fences, carparks) – S6, p.24
 - ii. Tree removal or replacement – S6, p.25
 - iii. Parliament House Vista – Aesthetic values (with specific attention to landscape impacts) – Table 7.3, p.37-38
 - iv. Parliament House Vista – Social values (with specific attention to landscape impacts) – Table 7.3, p.39
 - v. *Heritage Management Plan 2011* compliance – Table 7.5, Landscape – Eastern Precinct (p.54-56); Landscape Western Precinct (p.56)
 - vi. The overall assessment of these items as contained in the HIS is that the landscape changes across the site are generally sympathetic to and appropriate for the Memorial's Campbell precinct but note that particular care should be taken with the Eastern Precinct to achieve appropriate outcomes.

- b. Per Section 9.8.1b of this report the Memorial notes that landscape architecture is at concept design and will undergo further design and approvals before being carried out.

If the current changes to the pedestrian path to the west were conducted as shown eight unit plaques²⁹ would need to be relocated. The Memorial has previously repaired, replaced and re-located other commemorative plaques in the Western Garden, most recently those belonging to Z and M Special Forces from the Second World War. The Memorial has established protocols for such changes including contacting the relevant unit association, noting these are often run by descendants today, or in the case of still active units that might be affected (such as the RAN Fleet Air Arm) their commanding officer, to commence discussions around relocating and re-dedicating plaques with all appropriate care.

The Memorial has extensive experience and an excellent track record of engaging with veterans and descendants in a meaningful and appropriate fashion when dealing with heritage items associated with the service of specific individuals or units and would naturally rely on this for appropriate outcomes in this instance.

- c. The Memorial has engaged heritage architects, a landscape architect and arborists to date to develop the current Public Realm concept design. The Memorial will engage a heritage landscape architect to review the plans at detailed design as part of a heritage impact assessment of these works once detailed.

Commitment

Change 7.6.4.3: Commitment 4C – Landscape – Heritage Impact Assessment

The Memorial will undertake a heritage impact assessment of landscape designs at detailed design stage including consultation with the NCA and assessment by a heritage landscape architect to agree final design outcomes.

Change 7.6.2.8: Commitment 2H – Unit Memorial Plaques

The Memorial will conduct a heritage impact assessment of any plaques that require relocation in accordance with its *Heritage Management Plan 2011*. The Memorial will work with key stakeholders for any affected plaque to agree a new location and undertake a dedication ceremony for any relocated plaques if desired by stakeholders.

Changes to Preliminary Documentation

Section 7.2 Change to Attachments Refer to Attachment D Heritage Impact Statement of the FPD Updated Heritage Impact Statement following design detail changes in response to public and DAWE feedback.

²⁹ Royal Australian Navy – Fleet Air Arm; No. 13 Sqn RAAF; 55/53 Battalion; 5 Royal Australian Regiment; 2/4 Machine Gun Battalion; 2/1 Machine Gun Battalion; 35 Battalion (1939-45) and 7 Battalion (1939-45).

9.9 Section 7.6 of Preliminary Documentation - Impacts Assessment against National Heritage Values

The Memorial has recorded specific public comment against National Heritage Listing criterion below; as by their very nature these are value judgements the Memorial has only provided a response where a comment is factually incorrect. The Memorial's assessment is clearly laid out in Section 7.6 of the Preliminary Documentation.

SUBMISSION(S)	PD	THEME	ISSUE SUMMARY	RESPONSE SUMMARY
137	S7.6	Flawed Heritage Impact Statement (HIS)	<p>One submission contends that the Heritage Impact Statement at Attachment C was methodologically flawed and fails to assess the project under NHL Significant Impact Criteria 1.1 and the CHL criteria 1.2.</p> <p>The commenter also objects to the use of the NSW HIS preparation guidelines as the basis for the HIS and generally disagrees with the assessments against CHL and NHL criterion.</p>	<p>The Memorial notes its proposal has been correctly assessed under NHL Significant Impact Criteria 1.1 and the CHL criteria 1.2 through its original EPBC Referral and related processes, leading to the current assessment by Preliminary Documentation.</p> <p>The HIS was prepared based on NSW HIS preparation guidelines on the advice of DAWE.</p>

Community Breakdown:

Architectural Community (1)

Commitments:

- Nil

Changes:

- Nil

127	S7.6	National Heritage Values	One submission criticises the proposed project against all six listed National Heritage Values.	<p>No response required.</p> <p>Feedback from this submission on the issues raised here has also been captured and addressed elsewhere in this report.</p>
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Community Breakdown:

Community Interest Group (1); Architectural Community (1)

Commitments:

- Nil

Changes:

- Nil

9.9.1 **Flawed Heritage Impact Statement**

Submission 137

I believe that the new HIS (a Heritage Impact Assessment is required under the EPBC Act) is flawed methodologically. Firstly, as a National Heritage Place the AWM is defined as a matter of National Environmental Significance (MNES) and the project should have been assessed against the NHL Significant Impact Criteria 1.1 and the CHL criteria 1.2. I also believe it to be inappropriate to use the NSW heritage guidelines that focus on the nature of change rather than the impacts on heritage values, as is required under the EPBC Act.

Similarly, I generally disagree with the assessments in the HIS in relation to impacts on the National and Commonwealth values; in particular in relation to Criteria A Process & Events (Historic), B Rarity and E Aesthetic. For example, under the NHL Rarity Criterion B that identifies the relationship between the building, commemorative spaces and the collections, a Positive impact is assessed based on a claim of an expansion of this relationship, whereas I assess that the project will greatly damage and reduce this relationship and result in a High adverse impact.

9.9.2 **Criterion A – Events and Processes**

Submission 127

‘The AWM assumes no notable impact on this value. However, it dramatically changes the relationship of the site to Anzac Parade and the Parliament House Vista (new southern entry façade and reworked parade ground)

The AWM says no change is proposed for the sculpture garden however significant realignment of the plaque dedication pathway is proposed.

Impact to the exterior of the Main Building is considered minor by the AWM even considering the significant visual impact of the new northern building and its glazed element, and the new southern entry building façade (and stairs) on grade with the parade ground.’

9.9.3 **Criterion B – Rarity**

Submission 127

‘The AWM consider increased space to the display the collection as a positive impact but ignores the negative impact of the new northern building and its atrium, new southern entry, expanded parade ground and Eastern (expanded Bean Building and new carpark) works. The need for sensitive development that maintains the balance between the character of the Main Building and site and providing extra floor space for museum display seems to have been ignored.’

9.9.4 **Criterion C – Research**

Submission 127

‘The removal of all archive activities from the heritage Main Building as proposed by the AWM changes the integral relationship between the memorial, museum and archive and its focus on the Main Building.’

9.9.5 **Criterion E – Aesthetic Characteristics**

Submission 127

'The AWM believes aesthetic impacts of the proposal are minor. This ignores the impact of major changes to the north elevation, the south elevation (a whole new building façade at parade ground level), visibility from the Parliament House Vista, and immense new scale of the parade ground and the Bean Building. The AWM fails to link this perception of change to the intangible quality of the Hall of Memory and Roll of Honour – it does not 'stay the same' interpretation with this much different external interference. The AWM does not address change that will occur to the precious aesthetic characteristics of the place because of site development of this kind. Significant development on site clearly impacts interpretation of the so called 'untouched' elements in the Commemorative Area.'

9.9.6 **Criterion G – Social Value**

Submission 127

'Again, the AWM is unable to see that the intangible values of Anzac Parade, the Sculpture Garden and the Hall of Memory are also impacted by the adjacent physical changes. Change which damages or destroys its unique heritage values will undoubtedly affect the Memorial's social value.'

9.9.7 **Criterion H – Significant People**

Submission 127

'Anzac Hall was opened in the presence of Ted Smout – Australia's 6th last surviving WW1 veteran. This is significant but not considered in the AWM documentation.'

The sculpture garden plaque pathway is proposed to be realigned. These plaques were placed by surviving veterans of these units. This is significant but is not considered in the AWM documentation.'

9.10 Section 7.7 of Preliminary Documentation - Impacts Assessment against Commonwealth Heritage Values

The Memorial has recorded specific public comment against Commonwealth Heritage Listing criterion below; as by their very nature these are value judgements the Memorial has only provided a response where a comment is factually incorrect. The Memorial's assessment is clearly laid out in Section 7.7 of the Preliminary Documentation, Impact Assessment against Commonwealth Heritage Values

SUBMISSION(S)	PD	THEME	ISSUE SUMMARY	RESPONSE SUMMARY
127	S7.7	Commonwealth Heritage Values	One submission criticises the proposed project against three Commonwealth Heritage Values – Characteristics Values; Aesthetic Characteristics and Significant People	No response required. Feedback from this submission on the issues raised here has also been captured and addressed elsewhere in this report.
135; 158	S7.7	Commonwealth Heritage Values	Two submissions, both from Defence Families including one modern Roll of Honour family, expressed support across four values – Process; Rarity; Technical Achievement and Social Value	No response required. Feedback from these submissions is broadly consistent with that received from contemporary veterans and their families on these matters that did not specifically address the listed heritage value from this section.

Community Breakdown:

Community Interest Group (1); Defence Family (2)

Commitments:

- Nil

Changes:

- Nil
-

9.10.1 **Criterion A - Process**

Submission 158

The addition of new galleries will ensure that the stories of modern veterans from the last 30 years are recorded and displayed in the same way as those of the First or Second World Wars

I fully support the plan of ensuring that recent conflicts are honoured in the same way as previous conflicts. It is so important for the next generation of Australians to understand what has been - and continues to be - sacrificed by our current veterans. The impact of recent conflicts on our current veterans and families is an important story to tell.

9.10.2 **Criterion B - Rarity**

Submission 158

'Commemorate through understanding'

'the idea that we must understand and experience of our servicemen and women to truly remember and honour them'

'From the first time I visited the AWM many years ago until now, I have always left with the impression that the Memorial has remembered and honoured all of those that have served and continued to serve in the ADF.'

"The recent addition of the Afghanistan exhibition with the continuous images projected showing footage taken by soldiers as well as official video, provides a rare glimpse into what was experienced in that country. The images of the country, the dust & heat, the faces of locals as well as showing the soldiers in action - it is a powerful and moving experience.'

9.10.3 **Criterion D – Characteristic Values**

Submission 127

'The AWM's response ignores that the buildings design successfully fulfils its special functions and reinforces the role of the place as a shrine.'

'The AWM states simply that the Art Deco style is not affected and the building is still appreciable 'in the round'. They provided no evidence to support their statement and in lieu of the significant changes proposed in the north, east and southern precincts, all impacting the Main Building, it is not justifiable.'

9.10.4 **Criterion E – Aesthetic Characteristics**

Submission 127

'The AWM simply addresses this as 'the proposal does not diminish the Memorial's landmark status'. This ignores the major contribution the Memorial makes to the principle views from both Parliament Houses and the changes introduced into that sightline – particular the new southern entry building façade, the enlarged parade ground, and visible roof structure of the northern façade proposed works.'

9.10.5 **Criterion F – Technical Achievement**

Submission 135

'The success of the memorial as a landmark is due in part to it's distinctive massing and symmetry, its relative visual isolation given its privileged siting on the land axis; landscaped grounds and a backdrop of the forested slopes of Mount Ainslie.

The War Memorial as it stands is a unique and striking building, my experience of it has included an appreciation of the look and feel of the exterior and the remarkable view not only of the memorial but also reflecting back toward Parliament House. The sense of space and reflection of not only the physical presence of the site but what it represents has always been for me a key feature.

On entering the Memorial and viewing the displays I have felt that if the same feel of the exterior could be applied internally the experience would be enhanced greatly. This is no reflection on the quality or content of the exhibitions but rather a reflection on the lack of natural light, space for exhibitions and ability to pause and reflect privately.

In reviewing the plans proposed to further develop this site I am impressed but the care and thought taken not only to the heritage value of the building but what it represents. The plans maintain the existing façade, but also enhances the parade area for use for ceremonial activities. The increased capacity of the site through the extensions will improve the experience of visitors by creating the space for exhibitions to be expanded.

I applaud the way that the architects have incorporated natural light into the site. I am particularly impressed by the use of the skylight in the Southern Entrance and the ability for visitors to see and connect with the exterior and the view of the dome. The incorporation of digital displays will enhance the experience of visitors.

I think that the extensions to the War Memorial will enhance an already beautiful building and greatly add to the existing site and its purpose.

Submission 158

The additions will make the Memorial not just an Australian icon, but an international one.

To highlight and commemorate Australia's contribution to wars and peacekeeping is extremely important. The Memorial recognises and acknowledges Australia's involvement and support of our Allied countries - and in my opinion, this is such a wonderful way to recognise and acknowledge all the amazing Australians who took part in defending our country - whether it was at home or overseas. There are so many stories to tell and so many sacrifices made.

9.10.6 **Criterion G – Social Value**

Submission 135

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

Within my family we have veterans of several conflicts, both as volunteers and conscripts, I have taken the opportunity to study modern history including the conflicts that Australia has participated in. My experience has been that veterans (both family and friends) are unable to share with those they love what their experience has been. I think it is impossible to truly understand someone else's journey until you have travelled that path.

I think this Memorial plays a significant role in Australia to mark the sacrifice of those who have formed a part of our defence forces. I believe that its true strength is in its ability to help those who were not part of that journey to understand not only what the conflict was about but also the experiences and sacrifices of those who participated.

When I visited the War Memorial I thought the exhibits were incredible – the detail and devotion to sharing veterans' experiences helped to shape my understanding of what our forces faced. I would like to see that the War Memorial would be able to bring that same vision and dedication to sharing with visitors the more recent activities that our forces have participated in. To have to forgo the experience of one group of veterans for another seems to me to be disrespectful to their sacrifice.

I think it is vitally important to the generations of loved ones of our forces to provide them with a “touchstone” to veterans experiences. As an opportunity to learn, reflect and respect their experience but to also hopefully become an opportunity for conversation.

In my own experience of PTS within a family context it is the conversations not had and the behaviours not understood that create the greatest harm.'

Submission 158

'The changes to the Memorial will enable us to create and maintain 'special associations' with contemporary veterans and peacekeepers in the way we have First and Second World War veterans, their families and now their descendants"

As a contemporary War Widow, I am humbled by the fact that my husband's name is recorded on the Roll of Honour and that his medals are on display within the Memorial. The knowledge that he is remembered and honoured is a tremendous gift for me. One of my greatest fears was that he would be forgotten and the sacrifice he made for his country would never be known by future generations. To know that his name will remain at the Memorial forever fills me with pride. He and so many that served before and after him deserve our acknowledgement and respect.

I have never thought the Memorial has glorified war. I have always felt - even before meeting my husband - that the Memorial was a place of genuine reflection, of seeing & learning what our servicemen and women and so many others have sacrificed and continue to sacrifice.

And now the Memorial provides me with a place where I can go to honour him. To see & touch his name on the Roll of Honour, to stand in the Hall of Valour are moments that touch my heart. And I want future Australians to experience that.'

9.10.7 Criterion H – Significant People

Submission 127

'Again, the AWM states that impacts on the original features are limited and do not diminish the associative significance of the fabric. Clearly, the significant changes proposed will affect the original perception of the building.'

9.11 Section 7.8 of Preliminary Documentation - Impacts Assessment against Commonwealth Heritage Values of Parliament House Vista

The Memorial has recorded specific public comment against National Heritage Listing criterion below; as by their very nature these are valued judgements, the Memorial has only provided a response where a comment is factually incorrect. The Memorial's own assessment is clearly laid out in Section 7.8 of the Preliminary Documentation, Impact Assessment against Commonwealth Heritage Values of Parliament House Vista.

SUBMISSION(S)	PD	THEME	ISSUE SUMMARY	RESPONSE SUMMARY
030; 127	S7.8	APH Vista - Commonwealth Heritage Values	Two submissions were critical of the proposed project against four of the five listed Parliament House Vista National Heritage Values.	No response required. Feedback from this submission on the issues raised here has also been captured and addressed elsewhere in this report.

Community Breakdown:

Community Interest Group (2)

Commitments:

- Nil

Changes:

- **Section 7.8.2 Criterion E - Aesthetic Characteristics**

The criteria description incorrectly includes the first paragraph of the response in the attributes section. This paragraph has been shifted to the correct location, Section 7.8.2 in the Final Preliminary Documentation.

9.11.1 **Criterion A – Process**

No comments received.

9.11.2 **Criterion E – Aesthetic Characteristics**

Submission 030

'The inclusion of the AWM on the National Heritage List in 2006 noted (in criterion (e)), inter alia, that 'The AWM together with Anzac Parade form an important national landmark that is highly valued by the Australian community. As part of the Parliamentary Vista, the AWM makes a major contribution to the principal views from both Parliament Houses and Mount Ainslie. Views from Anzac Parade to the Hall of Memory, and from the Hall of Memory along the land axis are outstanding. Its prominent position is important due to its relative visual isolation on the Griffin land axis, amid the backdrop of the forested slopes of Mount Ainslie. The visual impact of the AWM when viewed from Parliament House and other points along Griffin's land axis including Mount Ainslie; and the fabric of Anzac Parade including the memorials, plantings and lighting is far more distinctive and dramatic compared to the other principal war memorials in Australia.'

'An outcome of the proposal, if approved, would be to increase the importance of the AWM relative to the other parts of the Parliamentary Vista - particularly Anzac Parade and Old Parliament House.

This outcome is clearly contrary to the factors above listed in criterion (e) because, while the AWM is obviously a discrete building, more importantly it forms part of the Parliamentary Vista and materially altering the AWM would unavoidably alter the Vista that Listing is designed to preserve.'

Submission 127

'The AWM has incorrectly included some of their response to this criterion as part of the criterion attribute. Whatever. The AWM acknowledges that the roof of the 'proposed Anzac Hall and Glazed Link' will be visible from Anzac Parade but believes it will not be 'unduly prominent'. The images provided at Attachment 03 Existing and Proposed Comparison along Anzac Parade of no support this belief. Their prominent is significant and the AWM ignores the impact of the roof line on this major sightline and the (increased) cumulative impact when viewed in conjunction with the impact created by the new southern entry building faced and oversized parade ground.

The AWM states that a copper roof on the new norther building will 'weather green allowing it to blend with the slopes of Mt Ainslie behind it' – and then deduces that this is a positive impact. This is also spurious reasoning – the impact of the new building and its atrium is clear.

The AWM acknowledges the expansion of the Bean Building will reduce open spaces around the Memorial. They state the expansion will occur towards the east so the Main Building can still be viewed in-the-round. This is incorrect – the proposed expansion is the to east and south with the southern expansion significant. This scale of building in that location will significantly change the landscape character of the precinct, the existing café building, and significantly impact the sense of isolation in the landscape of the Main Building.

Contrary to what the AWM claims – the north ('rear') elevation of the Main Building is NOT 'more visible [than it currently is] as a result of the design of [the new] Anzac Hall. Clearly this view and sense of the Main Building will be reduced and this is a significant impact.

The AWM claims that the replacement of existing mature trees (flanking the parade ground) with a new (and more symmetrical) planting will 'improve the relationship [of the site] with [the] designed landscape of Anzac Parade and improve its aesthetic presentation in the Parliament House Vista. The AWM provides no justification for this statement. The AWM Heritage Management Plan indicated the parade ground only has medium tolerance for change and should be retained and conserve. The proposed change notably hardens the interface between Anzac

Parade, the parade ground and on to the Main Building. It should also be noted that the impressive architectural street lighting installation on Anzac Parade, and the configuration of the roundabout at the junction with the Memorial, strongly relate to and compliment the current parade ground shape.'

9.11.3 **Criterion F – Technical Achievement**

Submission 127

'The AWM believes that because the proposed additions and alterations to the site are symmetrical along the land access (and supposedly of an appropriate height - although visible from Anzac Parade) they are not disruptive and that a more linear arrangement of the parade ground is better suited as a continuation of Anzac Parade. This assumes that a change to a more formal linear arrangement is complimentary to the site. I don't believe it is and this is supported by the existing heritage documentation. This proposal significantly changes the nature of the site and ignores the principles outlined in the AWM's own Heritage Management Plan. An oversized 'linear' parade ground ignores the value of this current axial arrangement, scaled appropriately to the Main Building, that gently transitions from Anzac Parade directing the view to the Stone of Remembrance and on to the building.'

'The existing spatial setting of the buildings as features in the landscape and their careful location which compliments the Main Building will be significantly weakened by the increased building and hardstand introduced by this proposal.'

9.11.4 **Criterion G – Social Value**

Submission 127

'The AWM ignores the impact of their proposed changes to the location of Plaque Dedication Program unit plaques installed in the western precinct. The Main access pathway in the western precinct contains the bulk of these plaques and this pathway is to be removed in their proposal.'

The AWM does not address the proposed removal of existing mature trees that flank the parade ground makes the statement 'Memorial features such as sculptures, plaques and commemorative trees are not impact by the proposal'. This again shows a disregard for the Heritage Management Plan and the tangible and intangible value of the landscape and its plantings.'

9.11.5 **Criterion H – Significant People**

No comments received.

Commitment

Nil

Changes to Preliminary Documentation

Section 7.8.2 Criterion E - Aesthetic Characteristics

The criteria description incorrectly includes the first paragraph of the response in the attributes section. This paragraph has been shifted to the correct location, Section 7.8.2 in the Final Preliminary Documentation.

9.12 Section 7.9 of Preliminary Documentation - Social Heritage Values

The Memorial categorised the 50 submissions commenting on Section 7.9 of the Preliminary Documentation into the following seven themes.

SUBMISSION(S)	PD	THEME	ISSUE SUMMARY	RESPONSE SUMMARY
001; 020; 028; 031; 036; 057; 059; 061; 076; 112; 114; 127; 143; 153	S7.9.7	Balance between Commemorative Space and Museum Function	<p>14 submissions raised concerns that the project would detrimentally alter the balance between the three roles held by the Memorial – shrine, archive and museum.</p> <p>Particular concerns were raised over a belief the Memorial was a memorial first or only; that more exhibition space would not increase commemorative outcomes and that insufficient attention had been paid to the balance of the three roles.</p>	<p>The Memorial recognises community concerns that the project may cause a dilution of the Memorial's role as the national centre of commemoration for those who have served, and in particular those who have given their lives, as both sincere and coming from a place of genuine concern.</p> <p>The Memorial's heritage listing clearly notes the importance of all three roles,</p> <p>Similarly Section 5 <i>Functions of Memorial</i> of the <i>Australian War Memorial Act 1980</i> also provides that the Memorial is entrusted to fill all three roles in order to meet its role as the national memorial with the roles of museum and archive being an integral part of the national memorial.</p> <p>The Memorial believes the proposed project will improve the Memorial's ability to act as a place of commemoration, as an archive and as a museum.</p>

Community Breakdown:

Architectural Community (2); Descendant (21); General Public (7); Community Interest Group (3);

Commitments:

- Nil

Changes:

- Nil

041; 072; 087; 092; 135; 162	S7.9.10	Inclusion of Withdrawal and Reflection Spaces	<p>Six submissions were supportive of the need for spaces for visitors, especially veterans and defence families, to retreat and reflect as part of their visit to the Memorial.</p> <p>Notably this need was expressed by veterans and descendants in particular, with five of the six submissions from these communities and more than 10% of veterans' submissions highlighting this as an issue.</p>	<p>The Memorial has recognised this as a critical need in its Preliminary Documentation and throughout its design process.</p> <p>The project will deliver dedicated respite and reflection spaces both within the Main Building and the New Anzac Hall, designed in conjunction with advice from experts, to allow veterans and their families to retreat and reflect during their visit to the Memorial.</p> <p>The Memorial will engage appropriately qualified consultants with relevant experience in dealing with veterans' mental health to provide key input into the design of the proposed withdrawal and reflection spaces.</p>
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Community Breakdown:

Veterans Community (4); Descendant Family (1); General Public (1)

Commitments:

- **Change 7.6.3.5 Commitment 3E – Withdrawal and Reflection Spaces**

The Memorial will engage appropriately qualified consultants with relevant experience in dealing with veterans' mental health to provide key input into the design of the proposed withdrawal and reflection spaces.

Changes:

- Nil

Supportive: 041; 092; 100; 105; 115; 120; 126; 129; 130; 136; 154; 159; Not Supportive: 016; 019; 050; 057; 066; 114; 139; 143; 144; 148	NEW	The Memorial as a place of healing	22 submissions commented on the Memorial as a place of healing. Of these 13 expressed belief, often from personal experience, in the value of the Memorial as a place of healing for some veterans and their families. The majority of these submissions were made by veterans (9) or members of contemporary defence families (1). Ten submissions dismissed the role of the Memorial in this context and objected to the project being founded on such a need. Notably this view was not expressed by any modern veterans or contemporary defence family members.	Anecdotally, including through written correspondence, it is clear that the Memorial itself has always been seen by some in the community, veterans and their families in particular, as a place of healing (neither therapy, nor treatment) since its inception. The Memorial believes that this will continue to be the case with the new space delivered by the project. Many of the supportive submissions on this matter, most critically from almost a quarter of veterans to comment overall, note the Memorial has indeed been a place helpful to them in this respect. The Memorial has not however at any stage of the funding or approvals process relating to the project relied on the potential healing value of the Memorial or the project as a driver for formal approvals or funding.
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Community Breakdown:

Supportive: Veterans Community (9); General Public (2); Defence Family (1)

Not Supportive: General Public (5); Descendant (2); Community Interest Group (2)

Commitments:

- Nil

Changes:

- Nil

011; 035; 071; 077; 081; 091; 093; 115; 119; 120; 122; 129; 133; 159; 160;	NEW	Education, Learning and Values	15 submissions commented on the Memorial as a place of education or a place where young or new Australians could or should come to learn about national and community values. The majority of these comments were made by veterans (9) and it is clear through their words that they see this as a particularly important function of the Memorial in general and in relation to their service in particular.	Learning is at the heart of the value cultural institutions offer their societies. In this regard the Memorial is the most visited national cultural institution as measured by University of Canberra's National Capital Education Tourism Project. The Memorial believes that the Project will enhance its ability to be an effective contributor to social values of this kind for the Australian community. The project will not only allow the Memorial to tell contemporary and future stories, and represent a contemporary and diverse view of Australian service in doing so, but will also enhance facilities at the Memorial to support schools visitation and education programs and to deliver a broader program of public education such as museum theatre and public lecture programs.
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Community Breakdown: Community Interest Groups (1); Defence Family (1); General Public (4); Veterans Community (9);				
Commitments: <ul style="list-style-type: none"> Nil 				
Changes: <ul style="list-style-type: none"> Nil 				
127; 137	NEW	Over emphasis on Social Heritage at the expense of other heritage values	Two submissions contended that the Memorial had placed an overemphasis on social heritage at the expense of other heritage values or failed to appropriately connect social and physical heritage values throughout its Preliminary Documentation.	<p>The Memorial notes that social heritage values are protected under the <i>EPBC Act</i> in the same manner as physical properties and the Memorial is required to address them in its documentation accordingly.</p> <p>As such the Heritage Impact Statement provided as Attachment C to the Preliminary Documentation fully and comprehensively assesses all heritage impacts from the project and their interrelationships. In Section 4 Summary Impact Assessment, social heritage is listed as just one of three specific heritage criterion referenced and only as one of five key points on the project impact. Similarly within the Preliminary Documentation itself Section 7.9 Social Heritage Impacts is just one of nine categories of heritage impact considered.</p> <p>There is no doubting the importance of the social heritage outcomes delivered by the Memorial to Australians. This is clearly demonstrated by the strong public response on the balance of commemoration and exhibitions at the Memorial and the role of the Memorial as a place of learning.</p> <p>Accordingly, the Memorial does not believe there is undue weighting on social heritage outcomes in its Preliminary Documentation</p>
Community Breakdown: Community Interest Groups (1); Architectural Community (1)				
Commitments: <ul style="list-style-type: none"> Nil 				
Changes: <ul style="list-style-type: none"> Nil 				

036; 058; 067; 144	NEW	Impact on National History	Four submissions contended that the proposed Project would promote an overly militaristic view of Australia's history or otherwise alter the national history in such a way as to marginalise other important cultural and historical events and influences.	<p>The belief that the proposed expansion of the Memorial will alter the balance of national history made in these submissions is not supported by any evidence, only by emotion.</p> <p>Careful examination of the matters such as investment in and visitation to cultural institutions as well as the broader issue of what young Australians are taught demonstrates that there is no meaningful danger to the balance of the national history being skewed by the telling of contemporary stories of service.</p> <p>Visits and virtual excursions represent only a fraction of the many hours students will spend studying history and our nation. To suggest that these programs, or general visitation to the Memorial, will warp the view of our national history is to give too much credit to the Memorial and far too little to the educators working with students and indeed to other key influences such as parents and other cultural institutions.</p>
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Community Breakdown:

Community Interest Groups (2); General Public (2)

Commitments:

- Nil

Changes:

- Nil

100	NEW	Veterans' Engagement	One submission highlighted the role that the Project could play in providing veterans' employment opportunities to support the transition from service to civilian life for some veterans.	The Memorial accepts this comment and agrees that the project offers an excellent opportunity to engage veterans in meaningful employment through the project and through this to offer experience and other career development opportunities to facilitate a successful transition from the ADF to civilian life. Additionally, the Memorial notes that the project may also provide opportunities for defence spouses and family members who also face a number of barriers to employment due to issues such as frequent relocations.
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Community Breakdown:

Veterans Community (1)

Commitments:

- **Section 7.6.2.7 Commitment 2G – Veterans and Defence Family Opportunity and Engagement Plan**
The Memorial will ensure veterans and defence family community are able to access employment and business opportunities through the project, this will be achieved through the Memorial's Veterans and Defence Family Opportunity and Engagement Plan.

Changes:

- Nil

9.12.1 Social Heritage – Balance between Commemorative Space and Museum Function

Issue

14 submissions raised concerns that the project would detrimentally alter the balance between the three roles held by the Memorial – shrine, archive and museum. There were three main considerations raised within these comments noting that in many instances comments touched on more than one of themes:

- a. There was a commonly held, though inaccurate, perception that the Memorial is a ‘memorial first’ or in a number of submissions, only a place of commemoration, and that the project should be evaluated on this basis. This perception, expressed in some ten submissions, ranged from one that stated that Charles Bean had never envisaged the Memorial as a museum and that ‘telling stories’ was not its role, to the claim of the Australian Institute of Architects that:

“it is essential that the National and Commonwealth heritage values and solemn purpose and nature of the site as a memorial, rather than as a war museum, are prioritised in all decision-making processes”³⁰

- b. A total of six submissions expressed a belief that increasing the size of museum spaces at the Memorial would either not increase the commemorative value of a visit or would in fact detract from it;
- c. Four submissions expressed concern the project was based on an over-emphasis on expanding the museum role of the Memorial or that insufficient consideration had been given to the commemorative and archival roles in the project.

Memorial’s Response

The Memorial recognises community concerns that the project may cause a dilution of the Memorial’s role as the national centre of commemoration for those who have served, and in particular those who have given their lives, as both sincere and coming from a place of genuine concern. We believe our design will alleviate this concern and, when delivered, do much to promote the balanced roles of the Memorial.

- a. The Memorial’s heritage listing clearly note the importance of all three roles,

‘Bean’s vision of a war memorial as a place to house the objects made sacred by their direct association with the events and sacrifice of Australians at war was embodied in the establishment of the AWM. A purpose built repository, the AWM is a place where the nature of commemoration was based on an integral relationship between the building, commemorative spaces and the collections of objects and records. This is rare in Australia and uncommon in the world. The AWM has a unique and important function in collecting and displaying objects and records of Australians’ experience of war.’³¹

³⁰ Submission 151, Australian Institute of Architects, Architectural Community

³¹ Australian Heritage Database, Australian War Memorial and the Memorial Parade, Anzac Pde, Campbell, ACT, Australia, Summary Statement of Significance, < www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=place_detail;place_id=105889 >

Similarly *Section 5 Functions of Memorial* of the *Australian War Memorial Act 1980* also provides that the Memorial is entrusted to fill all three roles in order to meet its role as the national memorial with the roles of museum and archive being an integral part of the national memorial³².

*Further, we are out to make our war museum, our war gallery, and our war library, if possible, not merely fine museums for Australia, but the finest the world contains.*³³

The core of the Memorial's power as a place of remembrance, one recognised worldwide as an exemplar institution, is the very combination of these functions in the one location. The Memorial again acknowledges the genuine nature of the concerns expressed in these submissions but notes that these submissions fail to fully appreciate the true nature of what it is that makes the Memorial so successful as a place of commemoration.

It is also critical to recognise that the balance between these roles must be seen to be appropriate not only across the site but also *within how varying conflicts and experiences are recognised in and of themselves*.

The Memorial recognises those who have given their lives for us in recent conflicts equally alongside those from earlier wars on the Roll of Honour.

The number of records and objects connected to those who have served in recent conflicts grows year by year to ensure that personal stories, unit histories and more are represented in the National Collection in the same manner as previous operations.

Our galleries however cannot display and share those materials and tell those stories as they do those of previous generations.

This project will correct that imbalance for the many Australians who have served in conflict or on peacekeeping operations over the past 35 years. It will also provide the Memorial the infrastructure and space to record and tell future stories too.

In doing so the Memorial will correct the balance of its three roles for contemporary and future service personnel and deliver for them and their families the same powerful remembrance as their forebears.

Based on the outcomes of previous major expansions the Memorial has undergone to include the Second World War, Korea, Vietnam and more, the Memorial expects these changes will not dilute the power of commemoration at the Memorial. Rather, by capturing more stories and especially by showing more and more diverse points of view it will make commemoration more representative, more inclusive and more powerful for all who visit.

³² Australian War Memorial Act 180 (Cth), S5 Functions of Memorial

³³ "The Great War, Part Two: Museum, archive, shrine", Robert Nichols, *The Australian*, available at: <https://specialreports.theaustralian.com.au/569671/museum-archive-shrine/>

On the specific issue of whether Charles Bean ever intended the Australian War Memorial to be a museum, the answer is a resounding yes. In fact, Bean conceived of an Australian war museum as early as 1915 on Gallipoli, an idea more fully and famously realised on the battlefield of Fromelles in 1916. This first vision was of a museum of war relics and a library of priceless records.³⁴

It was only in early 1917 that he realised that such a museum might also be a shrine to the fallen:

It was about this time that the thought occurred to me of getting the Australian Government to recognise the Museum of War Relics (which I believed certain to be established in Australia) as the national memorial for those who had fallen. I put it to General White who heartily agreed, and won Birdwood's support, and it was cabled as a recommendation to Australia. The Government accepted it, and we then decided that the care and administration of the relics should be made a department of Treloar's "Australian War Records Section" in England.³⁵

In 1922 the Exhibition Building in Melbourne housed the first major exhibition of material from what was then the Australian War Museum, which in turn became known as the Australian War Memorial in 1923.

- b. The Memorial agrees that expanding the size of exhibition spaces alone will not lead to improved commemorative outcomes. Increased space however will allow the Memorial to deliver careful and considered stories of contemporary service and sacrifice, delivered with appropriate context and interpretation and through this enable visitors to better understand contemporary conflicts and operations. It is through that improved understanding visitors will be able to remember and honour our recent servicemen and women as we do previous generations.

The importance of commemoration through understanding of contemporary service was emphasised in Submission 158, written by the widow of one of Australia's Afghanistan casualties:

As a contemporary War Widow, I am humbled by the fact that my husband's name is recorded on the Roll of Honour and that his medals are on display within the Memorial. The knowledge that he is remembered and honoured is a tremendous gift for me. One of my greatest fears was that he would be forgotten and the sacrifice he made for his country would never be known by future generations. To know that his name will remain at the Memorial forever fills me with pride. He and so many that served before and after him deserve our acknowledgment and respect.

I have never thought the Memorial glorified war. I have always felt – even before meeting my husband – that the Memorial was a place of genuine reflection, of seeing and learning what our servicemen and women and so many others have sacrificed and continue to sacrifice.

And now the Memorial provides me with a place where I can go to honour him. To see & touch his name on the Roll of Honour, to stand in the Hall of Valour are moments that touch my heart. And I want future

³⁴ "The Great War, Part Two: Museum, archive, shrine", Robert Nichols, *The Australian*, available at: <https://specialreports.theaustralian.com.au/569671/museum-archive-shrine/>

³⁵ Ibid

*Australians to experience that.*³⁶

- c. The primary purpose of the project is to deliver additional exhibition space to tell contemporary stories. The Memorial has however carefully considered the impact of this on the balance of the three roles (shrine, museum and archive) and sought to ensure each is catered for through project delivery.

The delivery of additional exhibition space, closely and sensitively linked to the Commemorative Area, the Roll of Honour and the Tomb of the Unknown Australian Soldier is a key element in this balance. Identified as critical, the telling of contemporary stories in close proximity to these commemorative elements is crucial to commemoration through understanding, and thence to the balance between these two roles of the Memorial.³⁷

Key design elements, such as the ability to view the dome of the Hall of Memory from the Oculus, the Research Centre viewing window, the Glazed Link (as well as the existing Administration Building east facing windows); ensure that commemoration remains a focus across the site. This is supported by other elements such as the New Anzac Hall aperture and reflection spaces that allow visitors the time and space to consider their experience of exhibitions spaces.

Importantly the new spaces allow for the proper display of current commemoratively focussed exhibitions, such as the Alex Seaton *As of Today* sculptural monument, which powerfully commemorates Australian soldiers who lost their lives while serving in Afghanistan, and the Tarin Kowt Wall, but also deliver space for future displays in this vein.

The project will also deliver a Research Centre greatly enhancing the Memorial's ability to collect, store and share records of our military history with the public and in doing so ensure that the archival role is balanced with the improved commemorative and museum roles.

And the visitor will be orientated and received properly on arrival into the new Southern Entrance. Taken together the changes delivered by the proposed project will improve the Memorial's ability to act as a place of commemoration, as an archive and as a museum.

Commitment

Nil

Changes to Preliminary Documentation

Nil

³⁶ Submission 158, Contemporary Defence Family

³⁷ See Preliminary Documentation S4.4.7, p.22

9.12.2 ***Social Heritage – Inclusion of Withdrawal and Reflection Spaces***

Issue

Six submissions were supportive of the need for spaces for visitors, especially veterans and defence families, to retreat and reflect as part of their visit to the Memorial.

Notably this need was expressed by veterans and descendants in particular, with five of the six submissions from these communities and more than 10% of veterans' submissions highlighting this as an issue. A submission from a female veteran with 40 years' experience, who also lost a partner to illness caused by his own Army service, expressed this need clearly:

*I am actively involved with veterans and their families – currently serving and former serving – and I believe my views are held by many contemporary and younger veterans. I have witnessed young veterans from recent operations use the Australian War Memorial as a place of reflection while visiting the small displays that reflect their service. In a number of cases the individuals and their families needed a quiet place for further reflection – this is not possible at present.*³⁸

Memorial's Response

The Memorial has recognised this as a critical need in its Preliminary Documentation and throughout its design process. The project will deliver dedicated respite and reflection spaces both within the Main Building and the New Anzac Hall, designed in conjunction with advice from experts, to allow veterans and their families to retreat and reflect during their visit to the Memorial.

These spaces will be supported by the improved circulation spaces also provided through the project which will allow more and better space for reflection, for veterans, families and visitors in general.

Commitment

Section 7.6.3.5: Commitment 3E – Withdrawal and Reflection Spaces

The Memorial will engage appropriately qualified consultants with relevant experience in dealing with veterans' mental health to provide key input into the design of the proposed withdrawal and reflection spaces.

Changes to Preliminary Documentation

Nil

³⁸ Submission 072, Veterans Community

9.12.3 *Social Heritage – The Memorial as a Place of Healing*

Issue

22 submissions commented on the Memorial as a place of healing.

Of these, 12 expressed belief, often from personal experience, in the value of the Memorial as a place of healing for some veterans and their families. The majority of these submissions were made by veterans (9) or members of contemporary defence families (1).

Ten submissions dismissed the role of the Memorial in this context and objected to the project being founded on such a need. This view was not expressed by modern veterans or contemporary defence family members.

Critical comments often cited a lack of evidence for any therapeutic role of the Memorial, stated belief that such a role was better left to the Department of Veterans' Affairs or medical experts, or criticised the concept of the Memorial as having a role within the 'therapeutic milieu' for veterans and their families.

Memorial's Response

Anecdotally, including through written correspondence, it is clear that the Memorial itself has always been seen by some in the community, veterans and their families in particular, as a place of healing (neither therapy, nor treatment) since its inception.

The Memorial is not providing treatment for traumatised veterans nor does it claim to be. The Department of Veterans' Affairs, the Department of Defence and professional medical services are, and should be, the primary source of assessment and treatment of physical or mental health issues suffered by current or former ADF members.

The Memorial has, however, always had a role in national grieving and healing. This is a natural second order effect of any site of commemoration and one that is particularly evident at the Memorial and it is a tangential and visible benefit of the project, not one upon which it has been predicated or developed.

The Memorial believes that this will continue to be the case with the new space delivered by the project. Many of the supportive submissions on this matter, most critically from almost a quarter of commenting veterans, note the Memorial has been helpful to them in this respect.

The Memorial is a critical part of the much broader social support that we should deliver to modern veterans to help them find meaning in their experience and help them communicate those experiences to their families and the public so that they can better understand and support our veterans.

This position is supported by ex-service organisations across Australia. The Memorial has worked with several experts and organisations in this field to ensure its efforts are in accordance with best practice for harm minimisation and are meaningful within limited resources.

The submissions received as part of this public comment process are typical of the anecdotal evidence the Memorial has accumulated as to its role as a place of healing, the quote below from the veterans' community demonstrates this:

*'All veterans who have ever worn the uniform have a story to tell and a connection with the Memorial in some way. Equally, those affected from their service can use the memorial to help heal hidden wounds or to help loved ones understand what they did on operations; this can often be difficult for veterans to tell their stories. The 'therapeutic milieu' of the AWM cannot be underestimated, both through personal previous family experience and anecdotally from those [members] who have worked with and supported and who have fought of the contemporary generation.'*³⁹

The Memorial has not at any stage of the funding or approvals process relating to the project identified healing, 'therapeutic milieu', veterans' mental health, or anything of that nature as part of the rationale for the project. This includes the documentation provided for PWC and EPBC consideration where the only reference is from the 2019–20 public consultation where this issue was raised by attendees, not the Memorial.

While the Memorial is not a place of therapy, it does have a therapeutic effect.

Commitment

Nil

Changes to Preliminary Documentation

Nil

9.12.4 Social Heritage – Education, Learning and Values

Issue

15 submissions commented on the Memorial as a place of education or a place where young or new Australians could or should come to learn about national and community values.

The majority of these comments were made by veterans (9) and it is clear that they see this as a particularly important function of the Memorial. The Memorial's role in the civic development of young Australians was also expressed in a number of submissions from the general public:

'Shame on those detractors who lack the vision to consider future generations of Australians who deserve to understand the values espoused by those who have served Australia in uniform. If the expansion of the AWM into the 21st century allows just one future leader to be temperate in their consideration of sending our troops into conflict, then our veteran's wishes will have been honoured... and Australia will be better for it....'

*'With net immigration approaching 200,000 per year there is no better institution to inform our "new Australians" of the sacrifices that have been made to ensure that we continue to enjoy, and cherish, a country which values freedom... and is prepared to defend it, no matter the cost...'*⁴⁰

This submission was provided by one of the Memorial's philanthropic supporters, someone who feels so passionately about this issue that they have donated substantial sums of their own money to supporting education programs at the Memorial.

³⁹ Submission 129, Veterans Community

⁴⁰ Submission 091, General Public

Memorial's Response

Learning is at the heart of the value cultural institutions offer their societies. The Memorial is the most visited national cultural institution (attendance by organised school visits to Canberra: Australian War Memorial – 88%; Parliament House – 83%; NMA 53%; NGA – 37%) and the highest performing (mean satisfaction 4.86/5.0) as measured by University of Canberra's National Capital Education Tourism Project.

The Project will enhance the Memorial's ability to effectively contribute to the social values of the Australian community. The project will allow the Memorial to tell contemporary and future stories, represent diverse views of Australian service, enhance facilities at the Memorial to support school visitation and education programs, and deliver a broader program of public education including museum theatre and public lecture programs.

Commitment

Nil

Change to Preliminary Documentation

Nil

9.12.5 Social Heritage – Overemphasis on Social Heritage at the expense of other heritage values

Issue

Two submissions contended that the Memorial had placed an overemphasis on social heritage at the expense of other heritage values or failed to appropriately connect social and physical heritage values throughout its Preliminary Documentation.

Memorial's Response

The Memorial notes that social heritage values are protected under the *EPBC Act* in the same manner as physical properties and the Memorial is required to address them in its documentation accordingly.

The independently prepared Heritage Impact Statement provided as Attachment C to the July 2020 Preliminary Documentation assessed all heritage impacts from the project. In Section 4 Summary Impact Assessment, social heritage is listed as one of three specific heritage criterion and as one of five key points on the project impact.

Within the Preliminary Documentation, Section 7.9 Social Heritage Impacts is one of nine categories of heritage impact. The social heritage impact in this documentation is of a similar level of detail to the other categories considered and notably neither the conclusion of the Preliminary Documentation nor the HIS lay out social heritage as a prime driver for heritage acceptability of the project.

There is no doubting the importance of the social heritage outcomes delivered by the Memorial to Australians generally and to veterans and their families specifically. This is demonstrated by the strong public response on the balance of commemoration and exhibitions at the Memorial, the role of the Memorial as a place of learning, and the importance of national values in our national history.

The Memorial does not believe there is undue weighting on social heritage outcomes in its Preliminary Documentation. The Memorial believes it has provided sufficient and balanced consideration of all

applicable Matters of National Environmental Significance to allow effective consideration of all impacts of the project.

Commitment

Nil

Changes to Preliminary Documentation

Nil

9.12.6 Social Heritage – Impact on National History

Issue

Four submissions contended that the proposed development project would promote an overly militaristic view of Australia's history or otherwise alter the national history in such a way as to marginalise other important cultural and historical events and influences.

The AWM should occupy a rightful and appropriate, not inordinate, place in the band of national cultural institutions.

This expansion project seems to be shifting the purpose of the building back towards a militarist, narrow sense of war and Anzac without its social and identity significance. Australia has other major sources of history, identity and achievements, conversely including engagement in peace and conflict resolution initiatives and movements, scholarship, institutions and ideals, equally as enduring and connected with the experiences of wars.⁴¹

Beyond the four submissions that explicitly mentioned this concern a number of other public comments critical of the project obliquely touched on the issue of the appropriate level of emphasis, or not, on our military history as a nation.

Memorial's Response

The belief that the proposed expansion of the Memorial will alter the balance of national history made in these submissions is not supported by any evidence.

Careful examination of the matters such as investment in and visitation to cultural institutions as well as the broader issue of what young Australians in particular are taught demonstrates that there is no meaningful danger to the balance of the national history being skewed by the telling of contemporary stories of service.

As an example, the Memorial is only one of 16 national cultural institutions⁴² located in Canberra, just one of more than 1,000 museums across Australia and but one of the many thousands of arts venues

⁴¹ Submission 036, Walter Burley Griffin Society

⁴² Joint Standing Committee on the National Capital and External Territories, Inquiry into Canberra's national cultural institutions, 2019, available at: www.aph.gov.au/Parliamentary_Business/Committees/Joint/National_Capital_and_External_Territories/NationalInstitutions/Report

visited by Australians each year. Visitation to the Memorial represents approximately 10% of visitation to major national museums⁴³ and an even smaller percentage of overall cultural attraction visitations.

It is also important to note that three of the major national cultural institutions in Canberra have been established in their permanent homes over the last 20 years (National Portrait Gallery, 2008; National Museum Australia, 2001, Museum of Australian Democracy, 2009). Such investment, which excludes consideration of major investments in state institutions over this time, clearly provides a counterpoint to the argument that the nation is over-investing in just its military history.

In this context the Memorial's development project is part of a broader trend in major capital investment in Australia's arts and cultural sector. This trend has seen cultural institution capital expenditure per capita increase almost 50% across all levels of government since 2007⁴⁴.

On this basis it is clear that the Memorial project is not an over-investment by any means, but rather it is consistent in scale and funding with other generational renewal projects for major cultural attractions across the country and part of a growing trend away from piece-meal and small scale add-ons to cultural institutions towards considered investment in these important national resources.

Similarly the Memorial is only one of many avenues of education for younger and new Australians. The Memorial's participation in education programs such as the Parliament and Civics Education Rebate (PACER) program are delivered in the context of the programs national curriculum profiles for History, Civics and Citizenship, English, Visual Arts, Science and Technology.

Visits and virtual excursions, especially for younger students, focus not on military history itself, but the value of service to the nation. The Memorial's We Will Remember Them onsite program, available for both primary and secondary students, demonstrates this focus and the highly commemorative nature of education at the Memorial,

*This program explores the reasons why we continue to remember the service and sacrifice of Australian servicemen and women, particularly on Anzac Day and Remembrance Day each year. Students will investigate the symbolism of the Memorial's Commemorative Area, identify a name on the Roll of Honour, and explore the Hall of Memory. They will also have the opportunity to participate in a short commemorative poppy laying ceremony at the Tomb of the Unknown Australian Soldier.*⁴⁵

Visits and virtual excursions of this nature, important though they are, represent only a fraction of the many hours students will spend in school studying history and our nation. To suggest that these programs, or general visitation to the Memorial, will warp the view of our national history is to give too much credit to the Memorial and far too little to the educators working with students from primary school to university level and indeed to other key influences such as parents and other cultural institutions.

⁴³ Impact of our National Cultural Institutions 2018-19, available at: www.arts.gov.au/what-we-do/museums-libraries-and-galleries/impact-our-national-cultural-institutions

⁴⁴ Department of Infrastructure, Transport, Regional Development and Communications, Office for the Arts, Cultural Data Online, < www.arts.gov.au/mcm/cultural-ministers-council/statistics-working-group-research >

⁴⁵ Australian War Memorial Website, www.awm.gov.au/visit/schools/programs/we-will-remember-them

Commitments

Nil

Changes to Preliminary Documentation

Nil

9.12.7 Social Heritage – Veterans' Employment

Issue

One submission highlighted the role that the development project could play in providing veterans' employment opportunities to support the transition from service to civilian life for some veterans,

Many veterans find it extremely difficult to find meaningful employment after life in the ADF and we often assist veterans who are unemployed. Unemployment can lead to family issues including, substance abuse, homelessness and mental issues.'

*'On a project of this scale, Veterans would be able to be employed to assist in the construction phase and this could lead to two or more years of work. That would be a fantastic outcome for all involved.'*⁴⁶

Memorial's Response

The Memorial accepts this comment and agrees that the project offers an excellent opportunity to engage veterans in meaningful employment through the project and through this to offer experience and other career development opportunities to facilitate a successful transition from the ADF to civilian life.

Further the Memorial notes that the project may also provide opportunities for defence spouses and family members who also face a number of barriers to employment due to issues such as frequent relocations to support a partner or parent's military postings or gaps in employment history arising from same.

The Memorial has already made a strong commitment to veterans and defence family engagement on the Project and will continue to deliver its Veterans and Defence Family Opportunity and Engagement Plan for the project.

Commitment

Section 7.6.2.7 Commitment 2G – Veterans and Defence Family Opportunity and Engagement Plan

The Memorial will ensure veterans and defence family community are able to access employment and business opportunities through the project, this will be achieved through the Memorial's Veterans and Defence Family Opportunity and Engagement Plan.

Changes to Preliminary Documentation

Nil

⁴⁶ Submission 100, Veterans Community

9.13 Section 7.10 of Preliminary Documentation - Indigenous Heritage Values

The Memorial categorised 16 public comments on Section 7.10 of the Preliminary Documentation into the following two themes.

SUBMISSION(S)	PD	THEME	ISSUE SUMMARY	RESPONSE SUMMARY
005; 006; 020; 046; 048; 055; 058; 060; 066; 068; 074; 111; 123; 144; 148;	NEW	Representation of Frontier Violence	15 submissions raised concerns that the project did not include or would not deliver appropriate recognition and representation of Australia's history of frontier violence and dispossession of First Nations People through colonial settlement.	<p>The Memorial recognises that this is an important issue for Australians from all stakeholder groups.</p> <p>The Memorial also recognises that more detailed research needs to be done into community sentiment and expectations on this issue. Through its gallery content stakeholder engagement the Project will conduct that research through both surveys of the general public and through setting up, and engaging with, the Memorial Aboriginal and Torres Strait Islander Advisory Group.</p> <p>The Advisory Group will have national representation and membership drawn from current veterans, veteran's families and local Traditional Owner Groups.</p>

Community Breakdown:

General Public (11); Descendant (1); Architectural Community (1); Community Interest Groups (1)

Commitments:

- Section 7.6.5.4 Commitment 5D: Future Galleries Content - Frontier Violence**
 The Memorial will establish and engage with a Memorial Aboriginal and Torres Strait Islander Advisory Group on the issue of First Peoples views of representation of frontier violence and other indigenous matters within the galleries.
- Section 7.6.5.5 Commitment 5E: Future Galleries Content Aboriginal and Torres Strait Islander Advisory Group**
 The Memorial will establish and engage with a Memorial Aboriginal and Torres Strait Islander Advisory Group on all exhibition content and design.

Changes:

- Nil

055	NEW	Aboriginal and Torres Strait Islander Memorial on Mount Ainslie	One submission requests the Memorial consider locating the Aboriginal and Torres Strait Islander memorial plaque located behind the Memorial on Mount Ainslie somewhere more prominent.	<p>This plaque, known as <i>The Rock</i>, is located on ACT land and managed by the Territory accordingly.</p> <p>The Memorial has in recent years worked closely with the Aboriginal and Torres Strait Islander Veterans and Services Association (ATSIVSA) to support for the annual Anzac Day ceremony held by ATSIVSA that occurs at this plaque following the National Dawn Service ceremony.</p> <p>The Memorial dedicated an Aboriginal and Torres Strait Islander service memorial, <i>For Our Country</i>, in the Sculpture Garden in the Western Precinct on 28 March 2019.</p>
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Community Breakdown:

General Public (1)

Commitments:

- Nil

Changes:

- Nil

9.13.1 *Indigenous Heritage – Representation of Frontier Violence*

Issue

15 submissions raised concerns that the project did not include or would not deliver appropriate recognition and representation of Australia's history of frontier violence and dispossession of First Nations People through colonial settlement.

A number of comments opposed approval of the development without inclusion of representation of frontier violence or the dispossession of First Nations Peoples through colonial settlement, while others expressed support for an exhibition on this subject at the Memorial.

Memorial's Response

This strong call for recognition of frontier violence is consistent with its first round of *EPBC Act* consultation where this was the second most frequently raised future gallery content topic across more than 500 Australians consulted.⁴⁷

This issue has more typically been framed as an issue of social heritage or relating to national reconciliation than the frame of gallery content' as in earlier consultation. Examples include:

*Australia's heritage and other values would be better served in other ways, such as: ... Finally rectifying the Memorial's ongoing refusal to recognise the Frontier Wars*⁴⁸

and,

*It [the Memorial] should make a major contribution to reconciliation with Indigenous Australians (First Nations Peoples) by recognising the Frontier Wars.*⁴⁹

The Memorial acknowledges the difference in these submissions and their differing intent. This is an important issue for Australians from all stakeholder groups, as is demonstrated by the fact that this issue has been consistently raised as a priority during *EPBC Act* consultation engagement and public comment periods and the Parliamentary Works Committee public comment process.

Telling the story of Defence of Country has become an increasingly important part of the Memorial's storytelling. Aboriginal and Torres Strait Islander peoples have a longstanding tradition of defending Country, and continue to serve with honour among our military forces. The Memorial is committed to telling their stories.

There are stories that highlight Aboriginal and Torres Strait Islander service in our galleries, exhibitions and the National Collection. The Memorial holds and displays works by noted artists such as Rover Thomas and Queenie McKenzie, which relate to nineteenth- and twentieth-century frontier violence as part of providing context for these stories.

The Memorial continues to work actively on expanding our art collection, and we are collaborating with leading Aboriginal and Torres Strait Islander artists on commissions relating to frontier conflict.

⁴⁷ Preliminary Documentation Attachment S1, Appendix A – Stakeholder Consultation, p. 51

⁴⁸ Submission 148, General Public

⁴⁹ Submission 060, General Public

The Memorial recognises that more detailed research needs to be done into community sentiment and expectations on this issue. Through its gallery content stakeholder engagement the Project will, over the next year, conduct research through surveys of the general public and through establishing and engaging with the Memorial Aboriginal and Torres Strait Islander Advisory Group.

The Aboriginal and Torres Strait Islander Advisory Group will ensure national representation and provide cultural advice and guidance for the future development of the Memorial, including strategic advice to the Memorial as it relates to the interests of Aboriginal and Torres Strait Islander peoples. The Advisory Group will provide advice and guidance in areas such as cultural protocols and permissions, representation, story development and assist the team to connect with communities and individuals. The Advisory Group undertakes the role of community liaisons and advocates for the Memorial as well as Aboriginal and Torres Strait Islander communities.

The Advisory Group will follow the principles developed by the Memorial's successful and highly regarded *For Our Country* memorial (which received the AIA ACT Branch's 2019 *Canberra Medallion*, its highest award for architecture) and *For Country for Nation* exhibition through national representation and membership drawn from current veterans, veteran's families and local Traditional Owner Groups.

Commitment

Section 7.6.5.4 - Commitment 5D – Future Galleries Content - Frontier Violence

The Memorial will establish and engage with a Memorial Aboriginal and Torres Strait Islander Advisory Group on the issue of First Peoples views of representation of frontier violence and other indigenous matters within the galleries.

Section 7.6.5.5 - Commitment 5E – Future Galleries Content - Aboriginal and Torres Strait Islander Advisory Group

The Memorial will establish and engage with a Memorial Aboriginal and Torres Strait Islander Advisory Group on all exhibition content and design.

Changes to Preliminary Documentation

Nil

9.13.2 *Indigenous Heritage – Aboriginal and Torres Strait Islander Memorial on Mount Ainslie*

Issue

One submission requests the Memorial consider locating the Aboriginal and Torres Strait Islander memorial plaque located behind the Memorial on Mount Ainslie somewhere more prominent.

*What effect will this have on the Indigenous Australians War Memorial which you have shamefully placed out the back of the War Memorial, almost as if “out of sight, out of mind”? Will it be affected and will it be relocated or we will see it brought out front or inside the War Memorial as it should be?*⁵⁰

Memorial’s Response

This plaque, known as *The Rock*, is located on ACT land and is managed by the Territory; the Memorial is unable to relocate it.

The Memorial has in recent years worked closely with the Aboriginal and Torres Strait Islander Veterans and Services Association (ATSIVSA) to support the annual Anzac Day ceremony held by ATSIVSA that occurs at this plaque following the National Dawn Service ceremony.⁵¹

The Memorial dedicated an Aboriginal and Torres Strait Islander service memorial, *For Our Country*, in the Sculpture Garden in the Western Precinct on 28 March 2019.

Commitment

Nil

Changes to Preliminary Documentation

Nil

⁵⁰ Submission 055, General Public

⁵¹ ATSIVSA Website, <www.atsivsa.com>

9.14 Section 8 of Preliminary Documentation - Heritage and Environment Mitigation Measures

The Memorial received one public comment regarding Section 8 of the Preliminary Documentation, Heritage and Environment Mitigation Measures this comment was categorised into one theme.

SUBMISSION(S)	PD	THEME	ISSUE SUMMARY	RESPONSE SUMMARY
127	S8	Mitigation Strategy 5 – Anzac Hall – Future Flexibility	One submission states that Mitigation Strategy 5 – Anzac Hall – Future Flexibility is incorrect and misleading.	This comment is incorrect; the Memorial's strategy, as demonstrated through its PD, is accurate and viable.

Community Breakdown:

Community Interest Groups (1)

Commitments:

- Nil

Changes:

- **Section 7.3.7 added new sections 4.4.9 – 4.4.12 JPW Masterplan 2017**
Additional section in response to public comment on whether the Memorial properly considered the JPW Masterplan 2017 during the design development phase.

Issue

One submission states that Mitigation Strategy 5 – Anzac Hall – Future Flexibility is incorrect and misleading:

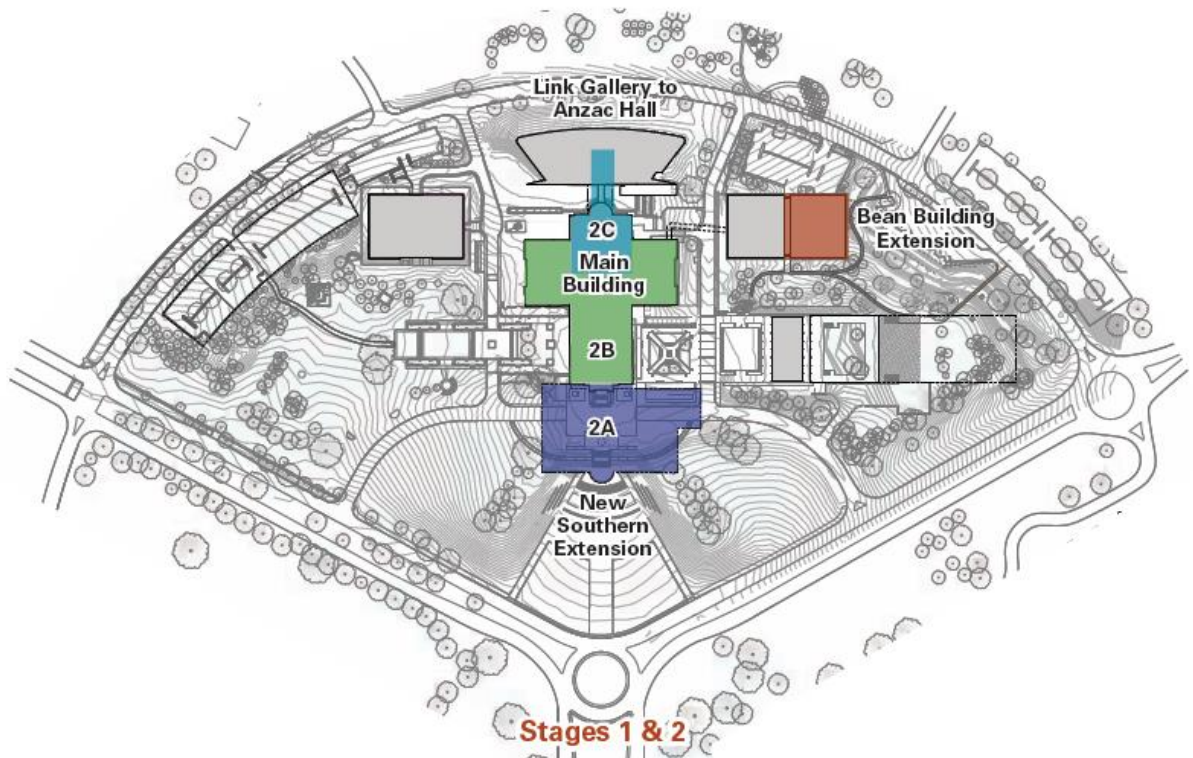
The AWM states that 'the Memorial considered expanding Anzac Hall or extending underneath it, however the design of the existing Anzac Hall resulted in neither option being technically viable...'. This is an incorrect and misleading statement. The AWM already has an engineered and costed AWM Building Concept Masterplan completed by JPW in November 2016 that shows excavation under Anzac Hall is technically and financially viable.⁵²

Memorial's Response

The 2016 Building Concept Masterplan, later developed into the JPW Masterplan 2017, examined a different conceptual solution to the Memorial's requirement for additional space. It involved the extension of the Bean Building, the development of a much larger Southern Extension not only as an entry but as a display and education space and the creation of a small link gallery underground between the Main Building and Anzac Hall.

Excavation under Anzac Hall was minimal as demonstrated in the concept sketch below:

⁵² Submission 127, Community Interest Group



Excavation of this nature is indeed technically and financially viable. It is however obviously of an entirely different scale of complexity and cost compared to excavating under the entirety of the existing Anzac Hall to create a below ground exhibition space such as that proposed through the current Project.

The Memorial notes that this concept plan was used as the basis of the Memorial's 2017 Initial Business Case. Through this, and the subsequent Detailed Business Case and design processes, it has been determined that this concept did not, and cannot, meet the requirements laid out by the Memorial, and agreed by government, to secure its long term future as the centre of national commemoration.

The Memorial's statement that it "considered expanding Anzac Hall or extending underneath it, however the design of the existing Anzac Hall resulted in neither option being technically viable" is neither incorrect nor misleading.

Commitment

Nil

Changes to Preliminary Documentation

Section 7.3.7 added new sections 4.4.9 – 4.4.12 JPW Masterplan 2017

Additional section in response to public comment on whether the Memorial properly considered the JPW Masterplan 2017 during the design development phase.

9.15 Future Gallery Content

The Memorial acknowledges that its Preliminary Documentation contains little detail on the content of the proposed gallery spaces. This is due to the nature of exhibition development as curators and designers must know what spaces they are working with before they can provide any meaningful detail on content or exhibition design.

As such it is both necessary, and a standard museum development process, for the Memorial to seek the relevant approvals on the building envelope before commencing detailed work on gallery design.

The Memorial recognises that the community is keen to better understand what specifically will go into the new exhibition spaces, or at a minimum the general curatorial intent, in order to understand the potential social heritage impacts of these galleries. To satisfy this need, the Memorial has prepared a public version of its Gallery Masterplan provide at [Attachment E3](#) of the Final Preliminary Documentation.

Through this public comment process the Memorial received 42 public comments on Future Gallery Content; these comments were categorised into three themes.

SUBMISSION(S)	PD	THEME	ISSUE SUMMARY	RESPONSE SUMMARY
Supportive: 055; 079; 091; 093; 094; 096; 098; 109; 115; 119; 133; Not Supportive: 005; 016; 019; 020; 028; 034; 040; 060; 065; 066; 069; 074; 075; 076; 078; 079; 083; 070; 084; 086; 112; 117; 123; 142; 143; 149; 156; 161	NEW	Large Technology Objects	The Memorial received 39 submissions on the issue of the display of Large Technology Objects (LTOs) as part of the Project. Of these submissions 11 were supportive and 28 raised concerns or objections.	The Memorial is cognisant of the need to ensure objects are displayed appropriately and has extensive policies and decades of practice in ensuring appropriate outcomes. LTOs play an important role in telling both the broader historical picture as well as personal stories of service. Many visitors most memorable moments from a visit are linked to objects such as the Lancaster aircraft "G for George", the Gallipoli Landing Boat or the Vietnam era UH-1 Huey helicopter and the associated, carefully and expertly, curated displays. The Memorial has engaged a team of skilled and experienced curators, historians and exhibition consultants to deliver the new gallery spaces. Community involvement in exhibition outcomes will also be a critical element of the project and in ensuring positive heritage outcomes for new displays, whether of LTOs or other types.

Community Breakdown

Supportive: General Public (4); Veterans Community (7)

Not Supportive: General Public (19); Community Interest Groups (2); Descendant (6);

Commitments:

- **Section 7.6.5.2 Commitment 5B – Future Galleries Content - Community Engagement**

Although future galleries content is not part of this current *EPBC Act* assessment, in response to community submissions the Memorial will ensure high levels of community input into future exhibition content development to meet community needs and expectations. Social heritage values will underpin exhibition development with input from key audience groups, including veterans and their descendants. This will be achieved through the strategies being developed through the project's Stakeholder and Community Engagement framework

Changes:

- **Section 7.2 Change to Attachments** Refer to [Attachment S5](#) Stakeholder Engagement Plan of the FPD

005; 060; 066; 067; 069; 071; 076; 105; 112; 143; 144; 161	NEW	Curatorial Content and Approach	<p>The Memorial received 12 submissions on curatorial content and approach for the future galleries.</p> <p>In general suggestions for future content or approaches were consistent with previous consultation efforts with a notable increase in calls for the Memorial to do more to explore peace-related issues</p>	<p>The Memorial notes these submissions and acknowledges the concerns and desires expressed in them, particularly in the context of social heritage outcomes.</p> <p>The Memorial will provide additional gallery development documents to articulate the aims, objectives, priorities and values that underpin the development of content for the new galleries.</p> <p>The Memorial believes that this should make its intended curatorial approach and intent sufficiently clear to meet the content expectations of the community and in particular those with special associations from a social heritage point of view.</p>
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Community Breakdown

General Public (6); Descendants Community (2); Community Interest Groups (3); Veterans Community (1);

Commitments:

- **Section 7.6.5.1 Commitment 5A Future Galleries Content - Heritage Assessment**

The Memorial will undertake a formal Heritage Impact Assessment, and if necessary further *EPBC Act* referral, for future gallery works delivered as part of the Project.

- **Section 7.6.5.2 Commitment 5B – Future Galleries Content - Community Engagement**

Although future galleries content is not part of this current *EPBC Act* assessment, in response to community submissions the Memorial will ensure high levels of community input into future exhibition content development to meet community needs and expectations. Social heritage values will underpin exhibition development with input from key audience groups, including veterans and their descendants. This will be achieved through the strategies being developed through the project's Stakeholder and Community Engagement framework.

Changes:

- **Section 7.2 Change to Attachments** Refer to [Attachment S5](#) Stakeholder Engagement Plan of the FPD and [Attachment E3](#) Gallery Masterplan to the FPD

066; 144	NEW	Live ADF Feed	Two submissions criticise the Memorial's proposal on the grounds it includes a live feed from the ADF or Defence and that this would politicise the Memorial.	The Project does not include a live feed and there is no reference to same in the Preliminary Documentation.
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Community Breakdown

General Public (1); Community Interest Group (1)

Commitments:

- Nil

Changes:

- Nil
-

9.15.1 *Future Gallery Content – Large technology Objects*

Issue

The Memorial received 39 submissions on the issue of the display of Large Technology Objects (LTOs) as part of the Project. Of these submissions, 11 were supportive and 28 raised concerns or objections.

Notably close to two thirds of the supportive submissions were from the veterans community and the Memorial received no objections from veterans to the display of LTOs from those who have served. Objections came largely from the general public with a smaller number from the descendants' community.

Positive submissions demonstrated strong support for the concept that it was important for people to see the real thing and that the display of tangible artefacts of war is critical to helping people understand the experience of servicemen and women and this includes the technology they use. This necessity was particularly important to those members of the Veterans Community who had commented, for example:

Since the era of the Vietnam war Australians have participated in many actions and these are equally important to be commemorated and kept real.

Culling the existing collection to accommodate more recent wars would be a tragedy - as would limiting the display to pictures and books. Veterans, families and future generations need to see and feel the aircraft, the tanks and guns to appreciate the significance of these actions and the roles of our heroes - and they are heroes all.⁵³

There were strong objections, and indeed a great deal of anger, in several Veterans Community responses to descriptions of LTOs as “war toys” or “big boys toys” through earlier consultation processes such as the Public Works Committee public comment period. A quote from one of the more temperate submission on this matter is provided below to illustrate the depth of feeling,

I note that there has been some unwarranted criticism of AWM plans to expand the display area to allow more artifacts/machines which epitomise the sacrifices made by Australians in defence of our country to be viewed by the public. In noting the term ‘war toys’, has been used in opposition of any expansion of the AWM, I take offence because this is an extremely pejorative description of machines or aircraft used in defence of Australia and trivialises the sacrifices of Australian servicemen and women who went to war in them. In a manner similar to the display of diaries, uniforms and dioramas depicting the conditions which Australians have endured during war, machines and aircraft give a dimension to the general public of the various battle arenas in which our military fought.⁵⁴

The Memorial acknowledges that the concerns raised regarding the potential display of LTOs are deeply and genuinely held by commenters and are based on the desire to see the best outcomes for the Memorial as a place of special importance to all Australians.

These submissions covered a number of related concerns, primarily that the Memorial would become a theme park or military hardware museum, that too many LTOs would diminish the commemorative

⁵³ Submission 115, Veterans Community

⁵⁴ Submission 133, Veterans Community

nature of the Memorial or that the Memorial would focus on the story of military technology rather than of the servicemen and women who used that equipment.

The following extracts are typical of these submissions and the nature of concerns were raised,

Submission 149

The current building is a great example of reverence in Architecture, the shrine is front and centre, no visit starts or ends without fitting reminder of what has paid for our freedom. The presentation inside never lease the people who fought for us far from thought.

It is that reason we must oppose a change that recasts the Memorial as a Museum of War Technology. Look no further than the imagery presented it uses Recruit Ads of Fighter Planes. Tanks lined up like a used car dealer ship and Helicopters as play equipment.⁵⁵

Submission 112

There should be a separate facility of the intention is to exhibit 'large technology items'. This is simply a euphemism for tools of warfare and an advertising opportunity for the manufacturers of such. Large items such as aircraft, artillery, etc are inconsistent with the purpose of a building that is a memorial for those who died in Australia's name. The character of a building purporting to be a memorial is irretrievably damage as a place for solemn reflection on sacrifice.

The memorial runs the high risk of its solemnity being down-graded and becoming simply a theme park and entertainment centre, especially for visiting school children able to 'dress up' and 'play the part'. Glorification and lower common denominator appeals, debase the solemnity and seriousness of the fundamental purpose of a memorial.⁵⁶

Submission 020

The focus of the AWM should, in my view, remain with those people who have served our country and not on the weapons and machinery of war. In that regard, I was dismayed to see so much of the proposed additions to the AWM being assigned to the paraphernalia of the military.⁵⁷

Memorial's Response

In order to provide context to this criticism the Memorial notes that it currently displays 52 LTOs such as large vehicles, aircraft or substantial partial objects such as the HMAS Brisbane Bridge and a Japanese submarine. The Memorial has been collecting LTOs since its inception, and displaying them since its opening in November 1941. Many of the objections are to the display of LTOs from contemporary operations, but the same critics are comfortable with the curatorial use of more historic LTOs to tell the stories of those who crewed them or called them home.

⁵⁵ Submission 149, General Public

⁵⁶ Submission 112, General Public

⁵⁷ Submission 020, Descendant Community

When the full galleries development is complete the Memorial expects that this number would rise to approximately 62. This includes the removal of some current LTOs from display (such as a small reduction of First World War aircraft on display) for conservation or curatorial reasons.

With the increase in space of some 55% to the galleries and an increase in LTOs less than 20% this results in a much less dense LTO experience for visitors, particularly in the New Anzac Hall compared with the extant Anzac Hall. This means more space for visitors to circulate and explore and a large relative increase in space available to tell individual stories and display smaller objects and images.

The use of LTOs as a physical representation of service and history is well established practice at the Memorial and museums around the world. The longest serving Director-General of the Imperial War Museum (IWM), Dr Noble Frankland, encapsulated this philosophy in relationship to the acquisition and display of the Second World War era HMS Belfast by the IWM, which he considered capable of representing “a whole generation of [historical evidence and service]”.

As attested to by a number of submissions supportive of LTO displays, the Memorial has a demonstrated history of displaying LTOs in an appropriate and respectful manner that does not glorify war nor place LTOs in the role of “big boys toys” nor serve as any kind of promotion for the manufacturer:

*The hardware [LTOs], supported by the personal stories of those who served, completes the picture, and enriches the visitor’s experience. The curators and historians at the AWM “commemorate sacrifice” by weaving stories that give the visitor a sense of what it was like to serve. The “Military Hardware” is an essential part of that story.*⁵⁸

One of these displays, the Second World War Lancaster “G for George” is a prime example of the manner in which the Memorial integrates LTOs into its broader storytelling and commemoration. This display sensitively integrates the Striking by Night audio-visual display with the Lancaster LTO, supported by a carefully curated display of supporting objects and stories of those who served on aircraft such as George.

An example of a modern LTO that could be displayed is the CH-47D Chinook helicopter A15-202 “Centaur”. This helicopter is connected to thousands of Australian and allied stories of service: those who flew and maintained it, the hundreds it transported to and from combat, supply or humanitarian operations, and those who were wounded, their lives transformed by their journey aboard this aircraft to ADF or coalition medical facilities. Chinooks flew more than 6,000 operational hours in Afghanistan between 2006 and 2013.

Centaur also reflects individual stories such as the tragic loss of Lieutenant Marcus Case in an Australian Chinook crash in Zabul Province in 2011, or the bravery and leadership of Captain Mick Whitney who received the Distinguished Service Medal for his actions on the day “Centaur” was damaged by enemy fire on operations in the Mirabad Valley in 2009.

⁵⁸ Submission 091, General Public

Centaur is also connected to other material held by the Memorial including the work of Official War Artists, crew diaries, photos and video of the aircraft in operation that emphasise the human element connected to the physical object.

Similarly, the Bushmaster Protected Mobility Vehicle, “Debbie”, is more than just a vehicle: it is the lens through which to explore a range of different experiences and stories associated with those who served in Iraq and Afghanistan. Having triggered an IED during a resupply mission in the Tangi Valley in Afghanistan in July 2012, Debbie can be interpreted as a universal object that speaks to the threats and dangers faced by thousands of Australians who deployed to the Middle East since 2005.

Through the experiences of the crew involved in the incident and those just like it, Debbie is the lens through which to tell stories of the long-lasting consequences of combat, the provision of medical assistance, trauma, resilience and post-service growth.

The Memorial has been actively involved in investigating personal stories directly connected to Debbie, although the vehicle is intended to be used to tell a much broader story of the impact of service on Australians.

One such story is that of Private Mathew Clarke of 6RAR – Debbie’s driver during the 2012 IED incident. His legs badly wounded in the blast, Clarke was evacuated to Australia where he spent a lengthy period of rehabilitation. He was able to visit the Memorial in 2014 with his family to get up close to the vehicle. By climbing out of the vehicle during that visit, Clarke felt he had finally completed the mission he never got to finish in 2012⁵⁹.

Other members of the crew involved in the blast have donated photographs, film, and objects associated with the IED incident. It is intended that oral histories with the crew will help capture the impact of the incident on their lives afterwards.

Commitment

Section 7.6.5.2 – Commitment 5B Future Galleries Content - Community Engagement

The Memorial will ensure high levels of community input into future exhibition content development to meet community needs and expectations. Social heritage values will underpin exhibition development with input from key audience groups, including veterans and their descendants. This will be achieved through the strategies being developed through the project’s Stakeholder and Community Engagement framework.

Change to Preliminary Documentation

Section 7.2 Change to Attachments Refer to Attachment S5 Stakeholder Engagement Plan of the FPD

⁵⁹ Debbie – A lot more than a truck, Australian War Memorial website <www.awm.gov.au/articles/blog/debbie-bushmaster>

9.15.2 *Future Gallery Content – Curatorial Content and Approach*

Issue

The Memorial received 12 submissions on curatorial content and approach for the future galleries. In general suggestions for future content or approaches were consistent with previous consultation efforts with a notable increase in calls for the Memorial to do more to explore peace-related issues. The key themes have been broken down into the following including the new peace theme:

- a. Context and Consequence: greater context on how Australia became involved in conflicts or peacekeeping missions;
- b. Diverse Representation: greater representation of the experience of groups such as militia/Reserves, Defence families, women, Indigenous service personnel and non-Australian Defence Force (ADF) deployments (including Australian Federal Police [AFP] and Department of Foreign Affairs [DFAT] personnel);
- c. Aftermath of War: impact of war on veterans and families (including Post Traumatic Stress and post-deployment deaths);
- d. Diverse Viewpoints: greater diversity of viewpoints in gallery content including representing the experience of those in countries where Australian forces operated;
- e. Educational and Museological Approaches: delivery of improved educational approaches, values and outcomes and reflection of modern museum practice(s) with regards to interpretation, use of technology and other museological matters; and
- f. Peace: the Memorial should broaden its coverage to include matters such as the promotion of peace, peacebuilding and protests against or opposition to war.

The submissions below are representative of the types of comment received on these matters:

Submission 066

The M frequently cites ADF peacekeeping operations as an example of efforts to avoid wars that it wishes to better display. While peacekeeping operations should be recognised and honoured, very many Australians outside the ADF have made huge efforts over many decades to prevent or stop wars and reduce its long-term harmful consequences.⁶⁰

Submission 144

The AWM claims to assist Australians to “remember, interpret and understand the Australian experience of war and its enduring impact on Australian society”, including “the events leading up to....” and “the aftermath of....” wars. However, there are many aspects of this broad context on which the AWM focusses very little attention. They include:

- *The historical context of each of Australia’s many wars, to help explain: How did this war begin? Who made the decision for war? What discussions were held in our parliament? Was the decision controversial?*

⁶⁰ Submission 066, General Public

Who opposed it and why? What might have prevented it? Which factors helped perpetuate it or stymie peace prospects? Did the war unite or divide the nation?

- *The impacts of Australia's wars on our security, including negative impacts from our involvement in the "war on terror" since 2001*
- *Economic impacts, particularly with the current huge expansion of our military hardware*
- *Our national identity. Is fighting wars the most important part of our history as a nation, or does such a view diminish awareness of our fine achievements in social, political and other spheres?*
- *Civilian experiences of war. Many Australians have suffered wars' ravages directly as civilians in other places before coming here. Their experiences should not be overlooked, lest we develop militarised and glorified views that ignore the reality of modern warfare – that most of its victims are civilians.*
- *Critical questions such as: Why do wars persist? What have we learnt?*⁶¹

Submission 060

*It [the Memorial] should provide greater coverage to efforts to prevent wars through diplomacy and peace keeping operations.*⁶²

Submission 071

*We need to tell the stories of what is being done to prevent wars, actions to protect both our citizens at home and while traveling, and what is done when an incident arises.*⁶³

Submission 074

Where in these plans are there any proposals to display the complexity of issues related to conflict? An accurately documented process detailing the background to the conflict including those who opposed the involvement in the Vietnam war, in Iraq and indeed the war in Afghanistan is necessary. Where is the documentation of dissent, the anti-war protests and the Peace movements that were so prevalent before the outbreak and during these wars and indeed in WW1 and WW2.

*In addition, I would like to see taxpayers' money allocated not just to the commemoration of the impacts of war, but the promotion of peace. Why not include a section in the museum devoted to Peace?*⁶⁴

Memorial's Response

The Memorial notes these submissions and acknowledges the concerns and desires expressed in them, particularly in the context of social heritage outcomes.

The Memorial's Preliminary Documentation does not include detailed curatorial information, nor can it at this stage as before the Memorial can commit to content it needs certainty around project approvals, particularly with regard to architectural designs, as these will drive specific curatorial solutions.

The Memorial has however provided its Gallery Masterplan and Stakeholder and Community Engagement Management Plan as additional attachments to its Preliminary Documentation. The Memorial has also

⁶¹ Submission 144, Community Interest Group

⁶² Submission 060, General Public

⁶³ Submission 071, Community Interest Group

⁶⁴ Submission 074, General Public

developed a Gallery Development Vision to articulate the aims, objectives, priorities and values that underpin the development of content for the new galleries.

The Memorial believes that between these three core elements its curatorial approach and intent should be sufficiently clear to assure the community that there is appropriate opportunity for community and stakeholder input to meet the expectations of the community and in particular those with special associations from a social heritage point of view.

Gallery Development Vision

The Gallery Vision is the foundation of all Gallery Development activities and will drive the development processes and ensure delivery against the five priorities of the Memorial's operating context. The Gallery Vision and Values will guide the gallery development teams to deliver compelling and unique visitor experiences.

The five key Gallery Development priorities that assist delivery of the Memorial's strategic objectives are:

- **Relevance** – Through public, veteran and other stakeholder engagement activities we will better understand our audience needs and ensure that the diverse perspectives of our communities are reflected in the new displays.
- **Inclusivity and accessibility** – In allowing participation and engagement of our audiences, we will make sure that our facilities and programs recognise diversity and are accessible to all.
- **Accountability** – Acting as custodian of the public's collection we will be objective and balanced through portraying different viewpoints. We will prevent censorship in order to remain authentic in representing all story owners.
- **Excellence and innovation** – We will be enterprising, creative and ambitious in augmenting traditional displays to inspire our audiences.
- **Sustainability** – We will forge productive relationships to ensure we are environmentally, socially and economically sustainable and that we maximise the Memorial's public value into the future.

The development of the galleries will be focussed outwards to our stakeholder constituents and the visiting public. Creating a veteran and visitor centred experience that reflects our diverse communities and our commitment to providing social and economic benefits will be integral to the success of the new gallery development and overall public value of the Memorial.

Commitment

Section 7.6.5.1 Commitment 5A – Future Galleries Content - Heritage Assessment

The Memorial will undertake a formal Heritage Impact Assessment, and if necessary further *EPBC Act* referral, for future gallery works delivered as part of the Project.

Section 7.6.5.2 Commitment 5B Future Galleries Content - Community Engagement

The Memorial will ensure high levels of community input into future exhibition content development to meet community needs and expectations. Social heritage values will underpin exhibition development with input from key audience groups, including veterans and their descendants. This will be achieved through the strategies being developed through the project's Stakeholder and Community Engagement framework.

Change to Preliminary Documentation

Section 7.2 Change to Attachments Refer to Attachment S5 Stakeholder Engagement Plan and Attachment E3 Gallery Masterplan of the FPD.

9.15.3 Future Gallery Content – ADF Live Feed

Issue

Two submissions criticised the Memorial's proposal on the grounds it includes a live feed from the ADF or Defence and that this would politicise the Memorial.

Memorial's Response

The concept of a live feed of Defence activity was raised by the Memorial in 2018 as a potential way to get visitors to better understand what the Australian Defence Force actually does.

It is important to emphasise that the proposal was never intended to politicise the Memorial but rather to help people understand what members of the ADF endure on a day to day basis, in peacetime or on deployment, to keep us safe.

It is just one of many curatorial concepts the Memorial has considered for providing visitors with a greater understanding of the realities and impact of war. In 2019 the Memorial decided not to proceed with a live feed or similar project for a variety of reasons, including concerns raised by the community, and it is not a part of the proposal put forward through the Preliminary Documentation.

Commitment

Nil

Change to Preliminary Documentation

Nil

9.16 Due Process

The Memorial received eight public comments on issues relating to Due Process and these comments were categorised into five themes.

SUBMISSION(S)	PD	THEME	ISSUE SUMMARY	RESPONSE SUMMARY
137; 138; 143; 153	NEW	Project Consultation	Four submissions expressed concerns about consultation processes relating to the project.	<p>The Memorial has undertaken extensive and genuine consultation relating to the project since 2017.</p> <p>The Memorial believes it has consulted appropriately with both key stakeholders and the general public.</p>
Community Breakdown: Architectural Community (3); Community Interest Groups (1)				
Commitments: <ul style="list-style-type: none"> Nil 				
Changes: <ul style="list-style-type: none"> Section 7.3.9 New Section 4.6.6. Moral Rights added to the FPD 				
143; 153	NEW	Other approvals processes	Two submissions expressed concern that the project has not undertaken appropriate approvals or has in some manner not been subject to appropriate government oversight.	The Memorial is confident it has, and continues, to meet all relevant approvals requirements.
Community Breakdown: Community Interest Groups (1); Architectural Community (1)				
Commitments: <ul style="list-style-type: none"> Nil 				
Changes: <ul style="list-style-type: none"> Nil 				
127; 144; 153	NEW	Preliminary Documentation Excessive, Confusing or Poorly Prepared	Three submissions criticised the documentation for being excessive, poorly prepared or confusing or expressed concern that there was insufficient time allowed to examine the documentation for proper public comment.	<p>The Memorial disagrees with the assessment that the Preliminary Documentation was excessive, poorly prepared or confusing. As a major project, with extensive heritage considerations in particular, this documentation is of necessity complex.</p> <p>The Memorial notes that this documentation has also undergone an extended public comment period.</p>
Community Breakdown: Community Interest Groups (2); Architectural Community (1)				
Commitments: Nil				
Changes: <ul style="list-style-type: none"> Section 7: Final Preliminary Documentation updated incorporating feedback from DAWE and internal review process. 				

009; 127; 153	NEW	Separation of project elements for approval(s) process(es)	Three submissions criticised the Memorial for separating some approvals processes from the main EPBC referral including the car park extension works and the future Main Building works.	<p>The Memorial notes that it undertook, and received, the appropriate approvals for the car park extension works. All relevant authorities were informed of the broader context of the upcoming Project as part of this process and approval was granted with that disclosure in mind. The Memorial believes this sufficiently demonstrates the soundness of this approach.</p> <p>On the issue of future Main Building changes the Memorial refers the reader to Section 9.3.2 Project Description – Main Building Changes of this report for a detailed response.</p>
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Community Breakdown

General Public (1); Community Interest Groups (1) ; Architectural Community (1);

Commitments:

- Nil

Changes:

- Nil

113; 127; 137; 143; 153; 157	NEW	Heritage Management Plan	Five submissions expressed concern that the Memorial's draft <i>Heritage Management Plan 2019</i> had not been approved before EPBC assessment commenced and urged assessment against this updated plan once approved. These submissions also expressed concern that the proposal would breach the Memorial's existing <i>Heritage Management Plan 2011</i> .	<p>The Memorial prepared its Preliminary Documentation against its current, approved, <i>Heritage Management Plan 2011</i> consistent with advice from DAWE.</p> <p>The Memorial acknowledges, and has clearly detailed, there are elements of the proposal inconsistent with individual policies within the <i>Heritage Management Plan 2011</i>. The Memorial's proposal however is consistent with its overall heritage management framework.</p>
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Community Breakdown

Veterans Community (1); Community Interest Groups (1) ; Architectural Community (2); Descendants Community (1)

Commitments:

- Nil

Changes:

- Nil

9.16.1 *Due Process – Project Consultation*

Issue

Four submissions expressed concerns about consultation processes relating to the project. These submissions raised concerns about the following core issues:

- a. A perceived lack of consultation or a lack of genuine consultation;
- b. A perceived lack of transparency about decision making processes relating to the project;
- c. Concerns that some early consultation was on the Memorial's future requirements rather than on designs; and
- d. Concerns that the Memorial had not adequately or genuinely consulted with moral rights holders associated with Anzac Hall or that the Memorial should have more closely engaged with moral rights holders on project design outcomes.

Memorial's Response

- a. The Memorial is disappointed to note that some commenters have perceived the consultations undertaken over the past three years as anything but genuine, and assures DAWE that this is not the case.

As an example through this current EPBC public comment process, the Memorial has identified some 50 changes to our documentation from the 167 comments received. Some of these are small, such as the correction of an error in the text, while others, such as the publication of our Gallery Masterplan or the changes to the Glazed Link connections that we are making in response to specific feedback are substantial.

Similarly, feedback from more than 1,000 Australians from November 2019 to January 2020, including no fewer than 46 face to face sessions held across the country supported by a demographically representative social heritage survey, also led to a number of design changes or provided input into our curatorial processes.

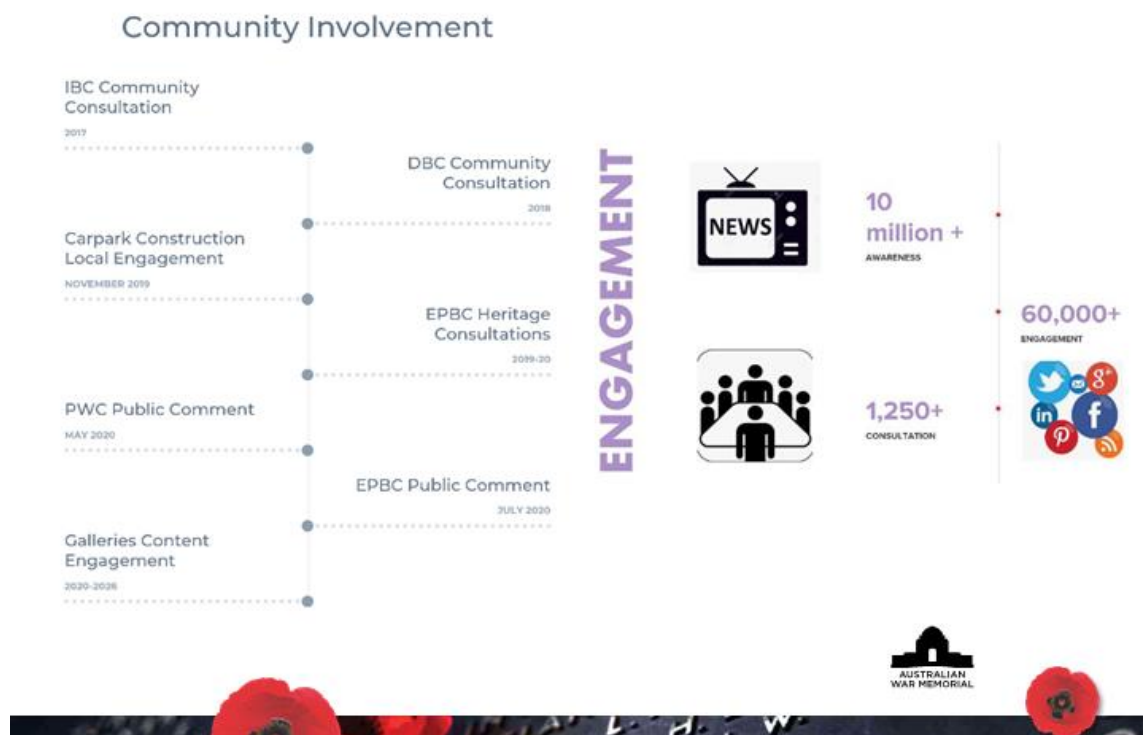
The Memorial acknowledges that it is unlikely that the changes we are making will satisfy all critics, but notes that serious consideration has been given to all comments on the Project through the seven major consultation processes held. This feedback has informed genuine and meaningful change as will future consultation on gallery content matters.

This next phase of consultation commenced in August 2020 when the Galleries Development Team initiated consultation on content through a series of Zoom presentations to the Australian Defence Force (ADF) history units.

Content consultation will initially focus on veterans as both key stakeholders and story holders, and will broaden out to other groups such as First Nations Peoples, educators, accessibility and inclusivity advocates, academics, peace activists and more, including of course the broader Australian community.

The chart below outlines the project specific consultation processes the Memorial has undertaken since commencing its Initial Business Case in 2017. Beyond this, the Memorial notes that it receives regular feedback from its more than 1 million visitors a year, ranging from our General Visitor Survey to the visitor comment book to the thousands of items of correspondence sent to us each year. The Memorial also engages with key stakeholders such as veterans groups and the ADF regularly through a variety of processes and draws feedback on all matters, including the project, through such avenues on a regular basis.

COMMUNITY INVOLVEMENT



- b. While some government decision processes, such as government consideration of a New Policy Proposal, are of necessity not undertaken in public the Memorial notes that it has been transparent about the Project to the maximum practicable extent at all times.

The proposal has been subject to intense media scrutiny and public comment since it was announced in 2018 and extensive informal and formal consultation processes have been undertaken. In relation to formal consultation processes the Memorial notes it has agreed unreservedly to extensions of all major public comment periods beyond legislated minimums.

The Memorial's Preliminary Documentation, and extensive supporting detail, also provides a great deal of transparency into processes around design decisions and outcomes. The Memorial is satisfied it has met any reasonable expectation for transparency around all project decisions.

- c. The Memorial has, and continues, to consult broadly on a variety of issues relating to the project. In the early phases it was critical to ensure there was a clear understanding of public expectations for the future of the Memorial to inform the functional design brief for any future design works.

Whilst the Memorial's early consultation may not have been focused on specific design or heritage issues, its impact on those matters down the track has been critical to the formation of the proposal currently under review. The Memorial considers it important that this consultation, which helps to demonstrate the need for the project and allows for greater understanding of specific scope elements, is part of the current heritage approvals process. This early consultation remains a key element in the Memorial's design considerations and in its current gallery content planning initiatives as well.

- d. Following advice received from the Australian Government Solicitor the Memorial has undertaken appropriate notification and consultation with Denton Corker Marshall as the moral rights holders for both Anzac Hall and the Bean Building. The Memorial also undertook reasonable efforts to contact individual moral rights holders where practicable.

As part of this moral rights notification in October 2018, the then Director of the Memorial encouraged Denton Corker Marshall to participate in future tender processes. In 2019, in accordance with government practice for achieving value for money outcomes, the Memorial conducted an open tender process for the architectural design packages relating to the project in which Denton Corker Marshall declined to participate.

Commitment

Nil

Change to Preliminary Documentation

Section 7.3.9 - New Section 4.6.6. Moral Rights added to the FPD

9.16.2 *Due Process – Other Approvals Processes*

Issue

Two submissions expressed concern that the project has not undertaken appropriate approvals or had in some manner not been subject to appropriate government oversight. The Australian Institute of Architects (AIA) raised the strongest objection on the grounds that:

*“The EPBC Act 1999 referral should also have been completed before the project was considered by the Public Works Committee. It is not right and proper that the Public Works Inquiry is being undertaken at the same time as the project referral to DAEE under the EPBC Act 1999, and without an updated and approved HMP in place. It is impossible for the Australian public and members of the Institute to have confidence that the Public Works Committee has the necessary information on the heritage impacts of the development in order to make an informed decision”.*⁶⁵

The AIA submission also goes on to call for the project to be assessed under the *EPBC Act* by Public Enquiry rather than Preliminary Documentation on this basis.

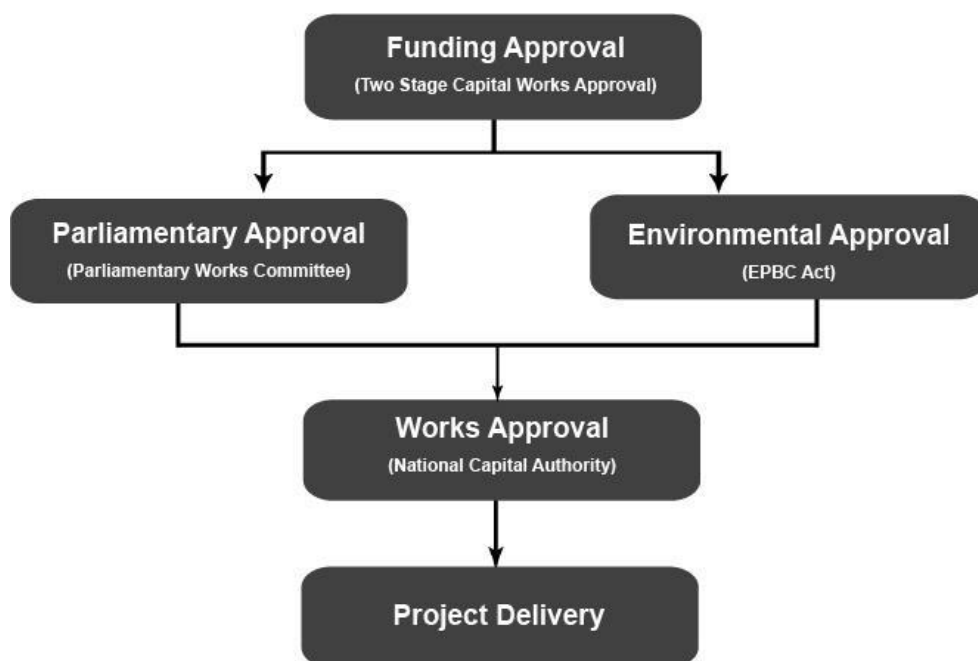
Memorial's Response

All public infrastructure needs to be reviewed to ensure that it remains fit for purpose and relevant. The Memorial is no different and the current Project is part of our ongoing commitment to provide facilities that match the requirements of our changing world and the expectations of our visitors.

Major government projects are a vital source of future prosperity for Australia. However, the benefits they bring such as employment opportunities and increased productivity must be weighed carefully against possible impacts on communities, the environment, heritage and other matters. The Project is no exception and, since the Memorial Council identified the need for the project in 2016, it has been assessed through the standard processes applying to any major government initiative.

There are four major approvals gateways for a Commonwealth government capital project in the ACT as seen in the flowchart below:

⁶⁵ Submission 153, Australian Institute of Architects



The Memorial secured funding approval in 2018 through the Two Stage Capital Works Approval Process which applies to all major government projects under the Commonwealth Property Management Framework.

The Memorial is now undertaking the necessary PWC and EPBC approvals for the project. These approvals are separate processes that assess different aspects of the project and it is not unusual for these processes to be run concurrently.

If the project receives PWC and EPBC approval, it will then progress to the Works Approvals process through the NCA.

The Memorial notes that through these approvals processes it has not simply provided documentation for approval, but has engaged extensively with relevant government departments and agencies.

Through the Detailed Business Case, the Memorial was supported by an Interdepartmental Steering Committee that included representatives from the NCA, Departments of Prime Minister and Cabinet; Defence; Veterans Affairs; Treasury; and Finance. Since project delivery commenced in May 2019 the Memorial has been, and continues to be, supported by an Interdepartmental Advisory Committee with representatives from those same bodies.

The table below provides a high level overview of the three major post-funding approvals processes. Each has been supported by site visits, meetings and extensive correspondence to ensure key decision makers are appropriately informed regarding the project.

APPROVAL ACTIVITY	DATE/REFERENCE	COMMENT
Parliamentary Works Committee		
<i>Parliamentary Works Committee – Medium Works Project (Project Early Works)</i>	5 April 2019	Medium works up to \$15m including Car Park extension and Enabling Works approved
<i>Parliamentary Works Committee – Major Works Submission</i>	February 2020	
▪ PWC site visit to Memorial	15 May 2020	
▪ PWC Public Comment Period	5 May 2020 to 17 June 2020	
▪ PWC Public Hearing	14 July 2020	
▪ PWC Site Visit to Treloar Technology Centre (Mitchell)	28 August 2020	
▪ PWC Decision	PENDING	
Environment Protection and Biodiversity Conservation Act Approval(s)		
<i>Environment Protection and Biodiversity Conservation Act (EPBC Act) Referral</i>		
▪ EPBC Act Referral submission	19 November 2019	
▪ EPBC Act Referral Public Comment	19 November to 13 December 2020	Extended public comment period (20 business days vs 10 required)
▪ EPBC Act Referral – National Consultation Roadshow	December 2019 to February 2020	46 face to face events in 21 locations across the country including each state or territory supported by nationwide survey.
▪ EPBC Referral - Referral Determination	18 December 2019	Determination: Controlled Action Assessment by Preliminary Documentation
▪ Submission of Variation to the EPBC Referral	17 March 2020	Addition of Bean Building extension and public realm works
○ EPBC Act Assessment by Preliminary Documentation		
▪ EPBC Preliminary Documentation DAWE consultation	February 2020 to May 2020	Consultation with DAWE on heritage and design matters
▪ Re-submission of EPBC Preliminary Documentation for Public Comment	11 June 2020	
▪ Public Comment Period	3-31 July 2020	Extended public comment period (20 business days vs 10 required)
▪ Ongoing DAWE consultation	July 2020 to September 2020	Ongoing consultation with DAWE on heritage and design matters
• Submission of Final Preliminary Documentation	PENDING	Expected in mid-September
National Capital Authority (NCA) Consultation		
NCA appointed to Interdepartmental Steering Committee for Development Project Detailed Business Case	April 2018 to November 2018	Six monthly meetings held; NCA represented at 5
NCA appointed to Interdepartmental Advisory Committee for project delivery	May 2019 - Ongoing	Seven meetings held; NCA represented at 6; meetings ongoing quarterly
<i>NCA Board Presentations</i>		
▪ Project Update Presentation	20 August 2018	Specifically conducted following Australian War Memorial Council decision on designs and prior to public announcement in November 2018
▪ Project Update Presentation	15 October 2019	Specifically conducted prior to EPBC Referral submission and public comment
▪ Project Update Presentation	23 June 2020	Specifically conducted prior to PWC and EPBC submission and public comment

The Memorial is confident it has, and continues, to meet all relevant approvals requirements. Based on this and the decision of DAWE to assess the project by Preliminary Documentation at the time of the controlled action decision, the Memorial rejects the AIA call for the project to be assessed by Public Inquiry.

Commitment

Nil

Change to Preliminary Documentation

Nil

9.16.3 *Due Process – Preliminary Documentation Excessive, Confusing or Poorly Prepared*

Issue

Three submissions criticised the documentation for being excessive, poorly prepared or confusing or expressed concern that there was insufficient time allowed to examine the documentation for proper public comment or that there was insufficient direction for the public on what matters they were being asked to comment on.

Memorial's Response

The Memorial disagrees with the assessment that the Preliminary Documentation was excessive, poorly prepared or confusing, and notes this criticism has been raised by only two percent of submissions. As a major project, with extensive heritage considerations in particular, this documentation is of necessary complexity. The main Preliminary Documentation report is designed to be a comprehensive but digestible package in order to allow for informed public comment.

The Memorial has in consultation with the DAWE, been careful to provide all relevant information including the large body of attachments, to allow fuller consideration of the project detail by interested parties should they choose.

The Memorial notes again that its Preliminary Documentation was out for comment for 20 working days, twice the minimum required period, and that it notified interested parties – including a number of those who raised this issue – of the document release in order to allow as much time as possible for their consideration.

Commitment

Nil

Change to Preliminary Documentation

Section 7: Final Preliminary Documentation updated incorporating feedback from DAWE and internal review process.

9.16.4 *Due Process – Separation of project elements for approval(s) process(es)*

Issue

Three submissions criticised the Memorial for separating some approvals processes or project elements from the main EPBC referral including the car park extension works and the future Main Building works.

Memorial's Response

The Memorial undertook approvals processes relating to the Poppy's Café Car Park extension works separately simply because these works were independent of the main Project. These works were not included in the scope presented in the Memorial's Detailed Business Case or the funding of \$498.7m appropriated by the government for the project. The Memorial notes that these works were subject to an independently prepared Heritage Impact Assessment as part of this process.

Whilst the Project will ultimately benefit from the completion of these works, they were necessary to meet ever increasing visitation to the Memorial whether the larger Project moves ahead or not.

On the issue of future Main Building changes, the Memorial refers the reader to *Section 9.3.2 Project Description – Main Building Changes* of this report for a detailed response.

Commitment

Nil

Change to Preliminary Documentation

Nil

9.16.5 *Due Process – Heritage Management Plan*

Issue

Five submissions expressed concern that the Memorial's draft *Heritage Management Plan 2019* had not been approved before EPBC assessment commenced and urged assessment against this updated plan once approved. These submissions also expressed concern that the proposal would breach the Memorial's existing *Heritage Management Plan 2011*.

Memorial's Response

In 2019, as it was preparing an updated plan, the Memorial consulted with DAWE on the issue of how the project should be assessed with respect to the Memorial's *Heritage Management Plan 2011*. Following the consultation with DAWE, it was instructed the Memorial to prepare its assessment against the *Heritage Management Plan 2011* as the existing and approved document.

Consequently, the Memorial has clearly and consistently applied not only the *Heritage Management Plan 2011* to its current proposal in full throughout each step of its development planning but importantly the other two key elements of its heritage management framework being the *Heritage Management Strategy 2019* and its *Heritage Register*.

The Memorial's *Heritage Management Plan 2011* is "a practical guide for conserving, managing and interpreting the site's heritage". It is not, nor was it intended to be prescriptive or the only factor in the Memorial's decision making process. Its objective is to (emphasis added):

ensure the conservation, management and interpretation of these heritage values of the AWM Campbell Precinct in the context of its ongoing use, development and evolution as the place of the National Shrine, an integral part of the symbolic landscape of the National Capital, and one of Australia's most significant cultural sites.

This extensive consideration has resulted in the Memorial advancing its proposal through a fulsome EPBC Act process as a result to ensure the best possible heritage outcomes. In this regard the Memorial has demonstrated through its will, in accordance with Item 1.3 of the *Heritage Management Plan 2011's* Conservation Policies: extensive EPBC Preliminary Documentation that its proposal:

Ensure all new developments contribute to the Heritage Values of the AWM Campbell site and its qualities as a unique place of symbolic importance to the nation.

The Memorial acknowledges, and has clearly detailed, there are elements of the proposal inconsistent with individual policies within the *Heritage Management Plan 2011*. The Memorial's proposal however is consistent with its overall heritage management framework.

This includes broader considerations than just the management of Anzac Hall such as Item 1.2 of the *Heritage Management Plan 2011* Conservation Policies:

Enhance the visitor experience and ensure it is in keeping with the heritage values of the Galleries.

These heritage values include the stories told in these spaces and the addition of new space to tell contemporary stories is critical to the Memorial's heritage values remaining relevant to all Australians.

As outlined in the Preliminary Documentation, the Memorial is confident that the proposal is in the best heritage interests of both the organisation and the nation.

Commitment

Nil

Change to Preliminary Documentation

Nil

9.17 Non-EPBC Matters

Through this public comment process the Memorial received 58 public comments on issues relating to non-EPBC matters; these comments were categorised into four themes.

SUBMISSION(S)	PD	THEME	ISSUE SUMMARY	RESPONSE SUMMARY
Supportive: 056; 082; 125; 136	N/A	Project Cost	24 submissions made comment on the cost of the project.	Noted
Not supportive: 001; 004; 008; 013; 017; 027; 028; 036; 042; 044; 048; 049; 052; 057; 067; 070; 074; 090; 134; 156;				The cost, and cost effectiveness, of the Project are being considered through the Parliamentary Works Committee process. This has included the opportunity for public comment on these matters.

Community Breakdown

Supportive: General Public (2), Veterans Community (1), Architectural Community (1)

Not Supportive: General Public (13), Descendants (3), Community Interest Groups (2), Veteran Community (1), Architectural Community (1)

Commitments:

- Nil

Changes:

- Nil

001; 042; 044; 057; 067; 074; 134; 156	N/A	Cost Effectiveness of replacing Anzac Hall	Eight submissions made comment on the cost effectiveness of replacing Anzac Hall.	Noted
				The cost effectiveness of the Project, including the replacement of Anzac Hall, is being considered through the Parliamentary Works Committee process. This has included the opportunity for public comment on these matters.

Community Breakdown

Architectural Community (1), Community Interest Groups (1), Descendant (1) General Public (4), Veterans Community (1)

Commitments:

- Nil

Changes:

- Nil

024; 050; 058; 060; 066; 069; 073; 074; 083;;	N/A	Defence Industry Sponsorship	Nine submissions made comment on the Memorial's policy regarding accepting sponsorship or in-kind support from the Defence Industry.	Noted
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Community Breakdown

General Public (7), Descendants (2)

Commitments:

- Nil

Changes:

- Nil

001; 003; 005; 007; 010; 012; 014; 015; 020; 021; 022; 023; 025; 028; 037; 039; 040; 042; 045; 050; 051; 057; 063; 066; 073; 074; 080; 084; 085; 086; 099; 101; 112; 114; 117; 134; 142; 148; 156;	N/A	Alternative projects or funding opportunities	39 submissions made comment on other ways to spend the funding allocated to the Memorial's Project.	Noted
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Community Breakdown

General Public (29), Descendant (6), Veteran Community (2), Architectural Community (1) Community Interest Groups (1)

Commitments

Nil

Changes:

Nil

9.17.1 *Non-EPBC Matters – Project Cost*

Issue

24 submissions made comment on the cost of the project. Four were supportive, seeing it as an important long term investment in social infrastructure⁶⁶ or seeing as having the beneficial side effect of stimulating the economy following the financial impact of the COVID-19 crisis.⁶⁷

The remaining 20 were critical of the expenditure in general or considered the amount excessive and would have preferred a smaller investment in the Memorial's future.

Memorial's Response

The cost, and cost effectiveness, of the Project are being considered through the Parliamentary Works Committee process. This has included the opportunity for public comment on these matters.

Commitment

Nil

Change to Preliminary Documentation

Nil

9.17.2 *Non-EPBC Matters – Project Cost*

Issue

Eight submissions made comment on the cost effectiveness of replacing Anzac Hall, all eight were critical of the cost effectiveness of replacing the existing Anzac Hall. These submissions also generally called for the retention of Anzac Hall on heritage grounds, these comments have been included in Section 9.6 of this report.

Memorial's Response

The cost, and cost effectiveness of the Project are being considered through the Parliamentary Works Committee process. This has included the opportunity for public comment on these matters.

Commitment

Nil

⁶⁶ Submission 082 (Veterans' Community); Submission 125 (Architectural Community)

⁶⁷ Submission 136 (General Public)

Change to Preliminary Documentation

Nil

9.17.3 *Non-EPBC Matters – Defence Industry Sponsorship*

Issue

Nine submissions made comment on the Memorial's policy regarding accepting sponsorship or in-kind support from the Defence Industry. All nine were critical of the Memorial accepting in-kind or financial support from defence industry companies, it was perceived as a conflict of interest.

Memorial's Response

Noted

Commitment

Nil

Change to Preliminary Documentation

Nil

9.17.4 *Non-EPBC Matters – Defence Industry Sponsorship*

Issue

39 submissions made comment on other ways to spend the funding allocated to the Memorial's Development Project. Alternatives suggested included:

- a. Social or financial support related to the impacts of COVID-19 (11 submissions);
- b. Financial support for other cultural institutions, including suggestions for both capital and ongoing funding, including calls for greater support to the ABC (12 submissions);
- c. The establishment of a national peace museum or peace foundation (4 submissions);
- d. Social or financial support for veterans and defence families (27 submissions);
- e. Direct expenditure on Defence or the ADF (2 submissions);
- f. Investment in clean energy (1 submission);
- g. Social or financial support related to the impacts of the 2019–20 bushfire season, including funding for rural fire services (4 submissions);
- h. Overseas aid to the South Pacific (1 submission); and
- i. Unspecified other priorities (4 submissions)

Note that many submissions suggested more than one alternative way to spend this funding and as such the total number of submissions noted above exceeds the 39 that touched on this issue overall.

Memorial's Response

Noted

Commitment

Nil

Change to Preliminary Documentation

Nil

10 CONCLUSION

This Response to Public Submissions report provides a comprehensive and considered response to public feedback received on the exhibited proposal in July 2020.

During and following this period, the Memorial has engaged with the Department of Agriculture, Water and the Environment on heritage impacts and continued to undertake detailed design refinement and resolution.

Public feedback provided through this process has been categorised, analysed and responded to in this report. Feedback has also driven changes to the July 2020 Preliminary Documentation and contributed greatly to the Memorial's Final Preliminary Documentation submitted September 2020.

Changes driven by this process include more than 50 updates, clarifications or changes to project documentation and supporting attachments. Although the core project proposal remains largely unchanged, considerable work has been undertaken to reduce heritage impacts identified through this process. This is reflected in substantial design detail changes to the proposed New Anzac Hall, Glazed Link, Oculus and Parade Ground elements in particular.

These changes are supported by a total of 20 formal commitments relating to the project put forth by the Memorial to provide assurance to the community that it will continue to seek input and offer meaningful engagement throughout project design and delivery if all relevant approvals are granted.

The Memorial has been the centre of national commemoration since it opened in 1941 and continues to be so today. This project will provide the Memorial with the capacity to fulfil this role for generations to come and ensure it can continue to tell contemporary stories of service and sacrifice well into the future.

Given the merits of the proposal, including large social heritage benefits for all Australians and strong support from the veterans' community, the Memorial considers this proposal to be in the public interest and believes that it warrants the approval of the Department of Agriculture, Water and the Environment under the *EPBC Act*.

11 APPENDICES

11.1 Appendix A - Key Theme Matrix by Individual Submission

11.2 Appendix B – List of Commitments

Appendix A

Key Theme Matrix by Individual Submission

81	Veterans Community	X		X			X								X					
82	Veterans Community	X		X			X													X
83	General Public		X					X	X	X	X									X
84	Descendant		X														X			X
85	General Public		X		X															X
86	General Public		X				X		X	X							X			X
87	Veterans Community	X		X	X		X		X	X					X					
88	Veterans Community	X		X																
89	Veterans Community	X		X																
90	General Public																			X
91	General Public	X					X								X		X			
92	Veterans Community	X					X								X					
93	Veterans Community	X					X								X		X			
94	Veterans Community	X															X			
95	Veterans Community	X		X																
96	Veterans Community	X															X			
97	General Public	X		X			X	X	X	X										
98	Veterans Community	X															X			
99	General Public		X																	X
100	Veterans Community	X					X								X					
101	General Public		X																	X
102	General Public		X																	
103	Architectural Community		X	X		X	X	X	X	X										
104	Veterans Community	X		X																
105	Veterans Community	X		X			X								X		X			
106	Veterans Community	X		X																
107	Descendant		X				X	X	X											
108	Veterans Community	X		X																
109	Veterans Community	X		X													X			
110	Veterans Community	X																		
111	General Public		X	X	X		X	X	X							X				
112	General Public		X	X	X	X	X	X	X	X					X			X		X
113	Veterans Community		X															X		
114	Descendant		X	X			X		X						X					X
115	Veterans Community	X		X			X								X			X		
116	Veterans Community	X		X											X					
117	General Public		X														X			X
118	General Public	X	X				X	X	X											
119	General Public	X		X			X								X		X			
120	Veterans Community	X		X			X								X					
121	General Public		X												X					
122	Veterans Community	X		X			X								X					
123	General Public		X				X									X				
124	Veterans Community	X		X													X			
125	Architectural Community	X		X	X															X
126	Veterans Community	X					X	X	X						X					
127	Community Interest Groups		X		X		X	X	X	X	X	X	X	X	X	X			X	
128	General Public	X		X																
129	Veterans Community	X		X			X								X					
130	Veterans Community	X		X			X								X					
131	Veterans Community	X		X																
132	Veterans Community	X					X								X					
133	Veterans Community	X		X													X			
134	Veterans Community		X																	X
135	Descendant	X		X			X	X						X		X				
136	General Public	X		X																X
137	Architectural Community		X	X	X	X	X	X	X	X	X	X	X		X			X		
138	Architectural Community		X			X								X				X		
139	Descendant		X				X								X					
140	Veterans Community	X		X	X		X	X	X	X										
141	Veterans Community	X																		
142	General Public		X															X		X
143	Community Interest Groups		X	X	X	X	X	X	X						X			X		
144	Community Interest Groups		X	X											X			X		
145	General Public	X		X												X				
146	Veterans Community	X		X																
147	Descendant		X	X	X		X		X											
148	General Public		X				X								X		X			X
149	General Public		X				X			X								X		
150	General Public	X		X																
151	Architectural Community	X			X															
152	Government		X	X			X	X	X	X		X								
153	Architectural Community		X	X	X							X			X			X		
154	General Public	X		X			X			X					X					
155	Veterans Community	X		X																
156	General Public		X		X		X					X					X			X
157	Descendant		X	X			X	X	X											
158	Contemporary Defence Family	X					X						X							
159	Contemporary Defence Family	X		X			X								X					
160	Veterans Community	X		X			X								X					
161	Descendant	X		X													X			
162	General Public	X		X			X								X					
163	General Public		X		X					X										
164	General Public	X		X			X			X										
165	Government																			
166	Veterans Community	X		X																
167	General Public		X																	

Appendix B

List of Commitments

List of Commitments

Commitment 1 – Mitigation Strategies

The Memorial commits to delivering the 17 mitigation strategies detailed in the Final Preliminary Documentation:

Mitigation Strategy 1 – Minimise Above Ground Changes to the Precinct

Mitigation Strategy 2 – Retain Prominence of Existing Stairs and Commemorative Area

Mitigation Strategy 3 – Use of Appropriate Precedents in Design Solutions – New Southern Entrance

Mitigation Strategy 4 – Use of Appropriate Precedents in Design Solutions – Glazed Link

Mitigation Strategy 5 – Anzac Hall – Future Flexibility for Expansion

Mitigation Strategy 6 – Use of a Design Competition to Select Architects and Design

Mitigation Strategy 7 – Selection of Skilled Architects and Engineers

Mitigation Strategy 8 – Quality in Design and Construction

Mitigation Strategy 9 – Environmental Management in Design and Construction

Mitigation Strategy 10 – Engage Appropriate Advice

Mitigation Strategy 11 – Use of Original Quarries

Mitigation Strategy 12– Monitoring for Structural Impacts

Mitigation Strategy 13– Anzac Hall – Record and Tell the History

Mitigation Strategy 14 – Photographic Recording

Mitigation Strategy 15 – Public Interpretation

Mitigation Strategy 16 – Consultation with RAOs

Mitigation Strategy 17 – Environmental management throughout construction

Commitment 2 – Heritage and Process Commitments

The Memorial makes the following commitments in relation to heritage and process matters:

Commitment 2A – Main Building – Heritage Advice

The Memorial will appoint an appropriate expert heritage advisor as part of the Main Building design process.

Commitment 2B – Main Building – Heritage Assessment

The Memorial will undertake a formal Heritage Impact Assessment, and if necessary further EPBC Act referral, for future Main Building architectural or engineering works delivered as part of the development project.

Commitment 2C – Retention of public access to existing Main Building Foyer

The Memorial will retain the existing entrance to the Commemorative Area through the Main Building Foyer at completion of construction for any and all visitors in the same manner as entry is undertaken today.

Commitment 2D – Anzac Hall – Community Memories

The Memorial will undertake a research project to prepare a representative sample of these memories from designers, veterans and visitors as part of Mitigation Strategy 15 – Public Interpretation to ensure that these public memories are recorded as part of the National Collection and made available to future generations.

Commitment 2E – Activating views in the round of the Main Building

The Memorial will train Visitor Services staff and volunteers to ensure they are able to assist visitors to understand and appreciate the importance of the ability to view the Main Building in the round while in the Glazed Link to maximise the use of the Main Building in this context. The Glazed Link will bring more visitors to the back of the building to appreciate the form of the Main Building.

Commitment 2F – National Capital Authority Approvals

The Memorial will undertake required NCA planning approvals required for the Development Project following relevant PWC and EPBC approvals.

Commitment 2G – Veterans and Defence Family Opportunity and Engagement Plan

The Memorial will ensure veterans and defence family community are able to access employment and business opportunities through the project, which will be achieved through the Memorial's Veterans and Defence Family Opportunity and Engagement Plan.

Commitment 2H – Unit Memorial Plaques

The Memorial will conduct a heritage impact assessment of any plaques that require relocation in accordance with its Heritage Management Plan 2011. The Memorial will work with key stakeholders for any affected plaque to agree a new location and undertake a dedication ceremony for any relocated plaques if desired by stakeholders.

Commitment 3 – Design and Construction Commitments

The Memorial makes the following commitments in relation to design and construction matters:

Commitment 3A – Fully Reversible Glazed Link

The Memorial will design, engineer and install a fully reversible Glazed Link design that can be removed without damage to the Main Building in future if necessary.

Commitment 3B – Anzac Hall building material re-use

The Memorial will re-use/recycle/repurpose as much Anzac Hall building material as practicable consistent with the National Waste Policy Action Plan 2019.

Commitment 3C – Oculus Detailing

The Memorial will work with DAWE and NCA to ensure appropriate final detailing for the Oculus is agreed and delivered.

Commitment 3D – New Southern Entrance Glazed Lift

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.

Commitment 3E – Withdrawal and Reflection Spaces

The Memorial will engage appropriately qualified consultants with relevant experience in dealing with veterans' mental health to provide key input into the design of the proposed withdrawal and reflection spaces.

Commitment 4 – Landscaping Commitments

The Memorial makes the following commitments in relation to landscaping matters:

Commitment 4A – Tree Layouts

The Memorial will agree the tree layout solution for each public realm area with the National Capital Authority in order to ensure an appropriate landscape character is maintained.

Commitment 4B – Landscape Climate Advice

The Memorial will seek expert landscape advice on the impact of climate change on landscape elements of the project including specifying native and drought resistant plant species across the site.

Commitment 4C – Landscape – Heritage Impact Assessment

The Memorial will undertake a heritage impact assessment of landscape designs at detailed design stage, including consultation with the NCA and assessment by a heritage landscape architect to agree final design outcomes.

Commitment 5 – Future Galleries Content

Although future galleries content is not necessarily part of this current EPBC Act assessment, in response to community submissions the Memorial makes the following commitments in relation to future galleries content:

Commitment 5A – Future Galleries Content - Heritage Assessment

The Memorial will undertake a formal Heritage Impact Assessment, and if necessary further EPBC Act referral, for future gallery works delivered as part of the development project.

Commitment 5B – Future Galleries Content - Community Engagement

The Memorial will ensure high levels of community input into future exhibition content development to meet community needs and expectations. Social heritage values will underpin exhibition development with input from key audience groups, including veterans and their descendants. This will be achieved through the strategies being developed through the project's Stakeholder and Community Engagement framework.

Commitment 5C – Future Galleries Content - Universal Access and Inclusion Peer Group

The Memorial will implement a Universal Access and Inclusion Peer Review Group as part of its Stakeholder and Community Engagement Management Plan. This group will be inclusive and representative of peoples with diverse needs and those who care for them. Opportunities for review and feedback on exhibition design documentation during the concept and developed design stages have been mapped. This Peer Review group will focus on universal access and inclusion, ensuring that the project meets best practice benchmarks and delivers against audience needs.

Commitment 5D – Frontier Violence

The Memorial will establish and engage with a Memorial Aboriginal and Torres Strait Islander Advisory Group on the issue of First Peoples views of representation of frontier violence and other Indigenous matters within the galleries.

Commitment 5E – Aboriginal and Torres Strait Islander Advisory Group

The Memorial will establish and engage with a Memorial Aboriginal and Torres Strait Islander Advisory Group on all exhibition content and design.