
ATTACHMENT K

AWM Eastern Carpark Extension
Heritage Impact Statement
By International Conservation Services



HERITAGE IMPACT STATEMENT

PROPOSED EASTERN CARPARK EXTENSION

AUSTRALIAN WAR MEMORIAL

By
International Conservation Services
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For the
Australian War Memorial

2019

EXECUTIVE SUMMARY

The Australian War Memorial (AWM) is proposing to extend the existing eastern precinct carpark at its site in central Canberra. The new carpark will have a temporary function related to proposed major redevelopment works at the Memorial, as well as a long term function to provide public parking.

The Memorial has a range of statutory heritage listings individually as well as part of larger heritage places. It is individually on the Commonwealth Heritage List and is part of the Parliament House Vista which is a larger area also on this list. The Memorial is also on the National Heritage List as part of a larger area including most of Anzac Parade. These lists are established under the *Environment Protection and Biodiversity Conservation Act 1999*.

This assessment has been prepared to assist the AWM understand any potential heritage impacts arising from the proposed extension.

Having considered the proposed carpark works, it is concluded that the works will have:

- minor impacts, especially in the medium term, regarding several National Heritage values;
- moderate impacts in the medium term and minor impacts in the long term on a number of landscape values identified in the 2011 AWM heritage management plan; and
- have a minor impact, especially in the medium term, on one landscape value identified in the 2010 Parliament House Vista heritage management plan.

In all cases, the long term re-creation of an informal landscape character with native trees mitigates the impacts, although the trees in the re-created landscape will not be as tall when mature compared to current mature plantings.

Related to these impacts, the works will also be not consistent or not fully consistent, especially in the medium term, with all relevant policies and actions in the heritage management plans.

The different levels of impact, minor or moderate, arise depending on the context of the value being assessed. For example, the more specific a value is related to the area of the proposed works, the greater the possibility of a higher level of impact.

While there are moderate impacts in the medium term, based on the apparent threshold being applied by the Department of the Environment and Energy, it seems likely these impacts would not be considered to be a significant impact within the meaning of the *Environment Protection and Biodiversity Conservation Act 1999*. In this context, an EPBC Act referral under Part 7 of the Act would not seem warranted unless certainty is required. None the less, because of the complexities of proposal, the National Heritage value of the Memorial, and the forthcoming and related major redevelopment, the AWM should consider further consulting the Department of the Environment and Energy.

In addition, these minor to moderate impacts do seem to constitute *adverse impacts* within the meaning of the Act. Section 341ZC states,

‘A Commonwealth agency must not take an action that has, will have or is likely to have an adverse impact on the National Heritage values of a National Heritage place or the Commonwealth Heritage

values of a Commonwealth Heritage place, unless:

- (a) there is no feasible and prudent alternative to taking the action; and
- (b) all measures that can reasonably be taken to mitigate the impact of the action on those values are taken.'

With regard to the proposed works, options that might be worth considering, if they have not already been considered, include:

- reviewing the carpark design to maximise the retention of mature trees;
- reviewing the overall landscape of the eastern precinct to seek re-planting options which would be sympathetic with the conservation of the landscape values of the precinct, and also considering this in the context of the overall future landscape of the AWM site as part of the Parliament House Vista; and
- examining the possibility of temporary landscaping measures on the upper carpark level, or other mitigation measures, to help screen the exposed carpark area.



INTRODUCTION

The Australian War Memorial (AWM) is proposing to extend the existing eastern precinct carpark at its site in central Canberra. The new carpark will have a temporary function related to proposed major redevelopment works at the Memorial, as well as a long term function to provide public parking.

The Memorial has a range of statutory heritage listings individually as well as part of larger heritage places. It is individually on the Commonwealth Heritage List and is part of the Parliament House Vista which is a larger area also on this list. The Memorial is also on the National Heritage List as part of a larger area including most of Anzac Parade. These lists are established under the *Environment Protection and Biodiversity Conservation Act 1999*.

This assessment has been prepared to assist the AWM understand any potential heritage impacts arising from the proposed extension.

The assessment relates only to historic heritage values. It does not consider ecological/environment issues which have been separately assessed, or the possibility of Indigenous heritage issues.

It is also noted the AWM is proposing to undertake a major redevelopment project which is related to the current carpark proposal. However, this assessment only considers the carpark proposal in isolation. It does not consider in any detail the carpark proposal in terms of the potential cumulative impacts related to the major redevelopment. None the less, some general comments are offered later in this assessment about potential issues which may arise.

This assessment is based on:

- 3D visualisations of the proposed carpark;
- architectural plans (GHD 2019);
- the heritage impact assessment for the AWM redevelopment (GHD 2019);
- the heritage management plan for the Memorial (Godden Mackay Logan 2011);
- the heritage impact assessment undertaken for the existing eastern precinct carpark (Godden Mackay Logan 2008);
- the heritage management plan for the Parliament House Vista (Marshall and others 2010);
- the relevant Commonwealth Heritage and National Heritage values;
- discussions and other information provided by the AWM; and
- a site inspection.

The AWM is in the process of updating its heritage management plan, and a draft has been released for public comment. However, given this plan has no formal status yet under the EPBC Act, the existing 2011 plan has been used instead.

SUMMARY OF PROPOSAL

The proposed works involve:

- the removal of up to 76 saplings, semi-mature or mature trees, including 28 mature trees, a grass area and the existing service roadway to enable construction of the carpark. It may be possible to reduce the number of tree removals depending on

- confirmation of the final extent of earthworks at the time of construction;
- excavation for the carpark;
- construction of a reinforced concrete carpark on two levels, with the structure partly buried because of the natural topography, along with concrete access roads and associated walls;
- the visible elevation of the carpark will have a light gray coloured metal blade finish, and part of the access road will have an exposed concrete retaining wall;
- for the period of construction for the AWM major redevelopment project, estimated to be 5 years, the upper level of the carpark will be a concrete deck carpark. This carpark will service construction workers;
- after this period, the treatment of the upper deck will be changed from a carpark to a landscaped area of grass and native trees. It is understood the 1 metre depth of soil to be used can support trees with a mature height of 5 metres. In addition, the access road to the upper deck temporary car park will be reinstated to a standard similar to the current loading dock access way and this area also re-landscaped; and
- making good to the remaining landscape disturbed during construction.

CONSIDERATION OF ALTERNATIVES AND MITIGATION MEASURES

During the course of the design of the carpark, the following alternatives and mitigation measures were considered:

- the proposed carpark is itself an alternative option to an initially proposed carpark located at another site – in Remembrance Park behind the Memorial;
- an option was considered to expand the width of the Treloar Crescent road reserve to achieve a design with perpendicular carparks in the middle of the road and parallel parking on either side. This option was not possible because of the number of services that run along the edge of Treloar Crescent and the significant cost of relocating those services; and
- an option was considered to retain the upper level of the proposed carpark as hard landscaping similar to the area west of the current café. However, this has not been pursued, and the landscaping option noted above is proposed.

HERITAGE VALUES

There are many sources of information regarding the heritage values of the Memorial, either individually or as part of larger places. While the landscape of the Memorial is not a major focus in much of this information, none the less, it is a component with some value contributing to the Memorial or larger heritage places. In particular, there are references to the surrounding landscape of the Memorial which includes the location of the proposed carpark. Such references occur in the National Heritage values for the Australian War Memorial and the Memorial Parade.

The setting and landscaped grounds also feature in the Commonwealth Heritage listing but the National Heritage listing presents a more detailed understanding.

The 2011 heritage management plan provides an extended discussion of the values of the overall landscape of the Memorial, as follows.

Landscape

The landscape of the AWM has evolved slowly since the 1940s and no design scheme is yet to be fully realised. The current layout contains elements of historic importance such as the sculptures in the Sculpture Garden and the Lone Pine, and select areas of the landscape meet the threshold for

historical value, but overall the wider landscape currently does not meet the threshold for historical value.

The central Parade Ground, the mature plantings, the Sculpture Garden, the location of the landscape at the foot of Mount Ainslie and at the terminus of the Parliament House Vista and land axis, all contribute to the high aesthetic values of this landscape in its broader setting. The Parade Ground represents a high level of technical and creative achievement as a successful response to the requirements and qualities of the site.

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

As the site has been considerably altered and disturbed by construction, most evidence of past Indigenous use of this landscape has been destroyed. A single artefact was discovered near the property boundary during consultation with Indigenous representatives, which has value to community members. (GML 2011, p. 41)

In terms of specific values, it also notes,

The landscape of the AWM Campbell Precinct primarily has aesthetic heritage values. The aesthetic values of this precinct are the formal characteristics of the Western Precinct contrasting with the informality of the Eastern Precinct. The Precinct has an important contribution to the values of the Parliament House Vista.

In addition to aesthetic values of the landscape the western precinct has aesthetic values in its sculptures, historic values in its memorials and the Lone Pine and social values in the memorials and Parade Ground. (GML 2011, p. 84)

...

To the east of the Memorial planting has been developed using eucalypts and wattles to give the appearance of an extension of the natural vegetation of Mount Ainslie, as proposed in the planting plans of 1952. (GML 2011, p. 25)

In the case of the Parliament House Vista Commonwealth Heritage place, the landscape of the Memorial is noted as an informal landscape element contributing to the treed character and framing of this area (Marshall and others 2010, vol. 1, p. 151).

It is important to note the date of these various sources of information about values, and the changes that have occurred at the Memorial subsequently. The National Heritage values were determined in 2006, the Parliament House Vista heritage management plan was finalised in 2010, and the heritage management plan for the Memorial was finalised in 2011. However, both heritage management plans were developed on the basis of the precinct in the period before 2010. In this period, the eastern precinct was quite different to the current situation with the earlier café and a surface carpark being present, along with greater tree cover. The café and carpark were replaced by the current café and underground carpark in 2010, along with changes to the landscape and treescape. The images above give some impression of these changes.

Accordingly, the National Heritage values and the two heritage management plans are based on the earlier, pre-2010 form of the precinct.

More detailed information from a range of sources about heritage values relevant to the Memorial is provided at Appendix A.

Aerial images of the eastern precinct in 2009 (left) and 2019 (right)

Source: ACTmap*i*



ASSESSMENT OF IMPACT

The central task of this assessment is to address the question: do the proposed works have, will they have or are they likely to have a significant or an adverse impact on heritage values? This question can be addressed by considering the impact on the identified heritage values.

Impact on Significance

Relevant Values	Impact/Comment
<i>National Heritage Values</i>	
The AWM building is a purpose built repository, reflecting the integral relationship between the building, commemorative spaces and the collections. This is unique in Australia and rare elsewhere in the world. The values are expressed in the fabric of the main building, the entrance, the Hall of Memory, the collections and the surrounding landscape.	No impact – while the surrounding landscape is noted in this value, the eastern precinct landscape affected is not a commemorative space in the sense referred to in the value text.
The AWM in its setting is of outstanding importance for its aesthetic characteristics, valued as a place of great beauty by the Australian community and veteran groups (as represented by the Returned & Services League of Australia). The place has evoked strong emotional and artistic responses from Australian and overseas visitors. The main building and the surrounding landscape, the Hall of Memory, the Roll of Honour, ANZAC Hall and the collections act as	Minor impact, especially in the medium term – given the removal of an area of the informal eastern landscape which will be replaced in the medium term by an exposed carpark area. In the long term, an informal landscape character will be re-created on the upper structure, and the temporary car park access road to the upper level will be reinstated to a standard similar to the current loading dock access way and landscaped.

Relevant Values	Impact/Comment
<p>reminders of important events and people in Australia's history and trigger disturbing and poignant responses from the vast majority of visitors.</p>	<p>This will mitigate the impact. The trees in the re-created landscape will not be as tall when mature compared to current mature plantings.</p> <p>It is noted the current landscape is partly from some time after 1952, and partly from the last decade. None the less, this landscape is the result of apparent efforts from 2010 to conserve the earlier informal landscape concept. As the heritage impact assessment for the eastern precinct development noted in 2008,</p> <p>‘[the] proposal for the landscape maintains and enhances the informal, recreational uses of the area with appropriate species of native vegetation, complementary [sic] to Mount Ainslie. It provides a suitable contrast to the formal commemorative spaces and exotic vegetation of the Western Precinct.’ (GML 2008, p. 17)</p>
<p>The AWM is the national war museum and national shrine, and together with Anzac Park, has special associations for the Australian community, particularly veterans and their families. These special associations are reinforced on ANZAC Day and at ceremonies specific to particular memorials on Anzac Parade. The AWM and the Anzac Parade memorials are the nation's major focal point for commemoration including the ANZAC Day march and other ceremonies and events. These values are expressed through: the AWM building (including the Hall of Memory); the collection; the surrounding landscape (including the Sculpture Garden); and Anzac Parade including the memorials.</p>	<p>Minor impact, especially in the medium term – as above.</p>
<p>The AWM building and the Anzac Parade memorials have special associations with Australia's military forces and veterans represented by the Returned & Services League of Australia.</p> <p>The AWM's success as a shrine, a museum, an architectural form and part of Canberra's urban plan is partly the result of its special associations with the lives and works of people who have been significant in Australia's history. These include the AWM's founders Charles Bean, John Treloar and Sir Henry Gullett.</p> <p>The values are expressed in the fabric of the place which includes: the main building; the Hall of Memory; the collections; the surrounding landscape; and Anzac Parade.</p>	<p>Minor impact, especially in the medium term – given the removal an area of the informal eastern landscape which will be replaced in the medium term by an exposed carpark area. In the long term, an informal landscape character will be re-created on the upper structure, and the access road to the upper level temporary car park will be reinstated to a standard similar to the current loading dock access way and landscaped. This will mitigate the impact. The trees in the re-created landscape will not be as tall when mature compared to current mature plantings.</p> <p>The character of the eastern precinct dates from planning in the early 1950s, a period when both Bean and Treloar were still involved with the AWM. While details of their involvement with the landscaping plans are not known, the proposed changes impact a likely attribute of the special associations noted.</p>
<p><i>AWM Heritage Management Plan – 2011</i></p>	
<p>Landscape The landscape of the AWM has evolved slowly since the 1940s and no design scheme is yet to be fully realised. The current layout contains elements of</p>	<p>No impact.</p>

Relevant Values	Impact/Comment
historic importance such as the sculptures in the Sculpture Garden and the Lone Pine, and select areas of the landscape meet the threshold for historical value, but overall the wider landscape currently does not meet the threshold for historical value.	
The central Parade Ground, the mature plantings, the Sculpture Garden, the location of the landscape at the foot of Mount Ainslie and at the terminus of the Parliament House Vista and land axis, all contribute to the high aesthetic values of this landscape in its broader setting. The Parade Ground represents a high level of technical and creative achievement as a successful response to the requirements and qualities of the site.	Moderate impact in the medium term/minor impact in the long term – given the removal of up to 28 mature trees and that they will not be replaced in the medium term. In the long term trees will be re-planted on the upper structure of the carpark which will mitigate the impact, although they will not be as tall when mature compared to current mature plantings.
While no specific community-based research has been undertaken, it is likely that the community would attach high value to the mature plantings on the AWM site. The landscape and setting of the AWM is also likely to be held in high esteem by veterans and other community members. (GML 2011, p. 41)	Moderate impact in the medium term/minor impact in the long term – given the removal of up to 28 mature trees and that they will not be replaced in the medium term. In addition, there will be the removal of an area of the informal eastern landscape which will be replaced in the medium term by an exposed carpark area. In the long term, an informal landscape character will be re-created on the upper structure, and the access road to the upper level temporary car park will be reinstated to a standard similar to the current loading dock access way and landscaped. This will mitigate the impact. The trees in the re-created landscape will not be as tall when mature compared to current mature plantings.
The landscape of the AWM Campbell Precinct primarily has aesthetic heritage values. The aesthetic values of this precinct are the formal characteristics of the Western Precinct contrasting with the informality of the Eastern Precinct. The Precinct has an important contribution to the values of the Parliament House Vista. (GML 2011, p. 84)	Moderate impact in the medium term/minor impact in the long term – the proposal will remove an area of the informal eastern landscape which will be replaced in the medium term by an exposed carpark area. In the long term, an informal landscape character will be re-created on the upper structure, and the access road to the upper level temporary car park will be reinstated to a standard similar to the current loading dock access way and landscaped. This will mitigate the impact. The trees in the re-created landscape will not be as tall when mature compared to current mature plantings.
To the east of the Memorial planting has been developed using eucalypts and wattles to give the appearance of an extension of the natural vegetation of Mount Ainslie, as proposed in the planting plans of 1952. (GML 2011, p. 25)	Moderate impact in the medium term/minor impact in the long term – as above.
<i>Parliament House Vista Heritage Management Plan – 2010</i>	
The landscape of the Memorial is noted as an informal landscape element contributing to the treed character and framing of this area.	Minor impact, especially in the medium term – given the removal of an area of informal landscaping and its replacement, at least in the medium term, with an exposed carpark area. In the long term, an informal landscape character will be re-created on the upper structure, and the access road to the upper level temporary car park will be reinstated to a standard similar to the current loading dock access way and landscaped. This will mitigate the impact. The trees in the re-created landscape will not be as tall when

Relevant Values	Impact/Comment
	mature compared to current mature plantings.

Consistency with Relevant Conservation Policies and Strategies

The following relevant conservation policy and strategy extracts are drawn from the current heritage management plans for the Memorial (GML 2011) and Parliament House Vista (Marshall and others 2010).

Relevant Conservation Policies and Strategies	Consistency/Comment
<i>AWM Heritage Management Plan – 2011</i>	
1.1.1 Conserve, renew and manage the Eastern Precinct so that it reflects and is in keeping with the national importance of the AWM Campbell Precinct.	Not fully consistent, especially in the medium term – given the impacts on National Heritage values noted above. The longer term re-creation of an informal landscape character will mitigate the impact, although the trees in the re-created landscape will not be as tall when mature compared to current mature plantings.
1.1.3 Conserve and manage important views and glimpses to the AWM main building, ANZAC Parade and Mount Ainslie.	Consistent – none of the important views noted will apparently be impacted.
1.1.4 Retain the natural native vegetated character of the Eastern Precinct.	Not consistent in the medium term – given the loss of up to 76 native plantings including up to 28 mature trees. It is noted other native plantings will remain. The longer term re-creation of an native landscape character will mitigate the inconsistency in the longer term.
1.2.1 Conserve and manage the character of the Eastern Precinct, particularly its role in the broader AWM setting at the terminus of the land axis and against Mount Ainslie.	Not consistent in the medium term – the character of the precinct has changed since the heritage management plan, and the proposed changes will erode that character in the medium term. The longer term re-creation of an native landscape character will mitigate the inconsistency in the longer term.
1.3.1 Ensure the protection and management of the mature native trees in the Eastern Precinct in the context of its future redevelopment and improvement.	Not consistent – given the loss of up to 28 mature native trees. The longer term re-planting of trees will mitigate the inconsistency, although the trees in the re-created landscape will not be as tall when mature compared to current mature plantings.
1.4.1 Conserve and manage the combination and juxtaposition of formal architectural components in the landscape and informal mature plantings, sloping ground and lawn areas for recreation.	Not consistent in the medium term – given the loss of up to 28 informal mature plantings and some of the lawn area. The longer term re-creation of an informal landscape character with lawn areas will mitigate the impact, although the trees in the re-created landscape will not be as tall when mature compared to current mature plantings.
1.5 Conserve and protect the heritage values of the AWM Campbell Precinct when considering future changes to this precinct so as to avoid adverse effects to, and if necessary mitigate impacts.	Consistent – these changes are considered necessary by the AWM and an effort has been made to mitigate impacts.
<i>Parliament House Vista Heritage Management Plan – 2010</i>	
<i>Policy 16 General conservation provisions for the landscape</i> The overall Parliament House Vista study area	Not fully consistent in the medium term – given the loss of trees, in particular up to 28 mature trees. The longer term re-planting of

Relevant Conservation Policies and Strategies	Consistency/Comment
<p>landscape character will be conserved as parkland with a balance of formal and informal elements. In particular...</p> <ul style="list-style-type: none"> • conserve the treescape... • conserve the balance of formal and informal landscape treatments using indigenous natural values and cultural values... • conserve the juxtaposition of bush with the formality of the built environment... 	<p>trees will mitigate the inconsistency, although the trees in the re-created landscape will not be as tall when mature compared to current mature plantings.</p>
<p>16.1 The NCA will discuss with the Australian War Memorial opportunities to strengthen the evergreen framework plantings (ie. evergreen trees, either native or exotic) in the western area to the side of the Australian War Memorial building to achieve a better overall landscape balance for the Parliament House Vista.</p>	<p>While this strategy does not directly relate to the eastern precinct, it reflects a concern to achieve an overall landscape balance between the eastern and western precincts in terms of the evergreen framework plantings. The removal of trees in the eastern precinct will weaken the evergreen framework plantings in this area.</p>
<p>Policy 49 General provisions relating to new development The following general provisions will be implemented:</p> <ul style="list-style-type: none"> • new permanent developments will not impact on the heritage values of the area nor on important spatial relationships between individual buildings and open spaces (eg. the relationship between the High Court and National Gallery, or between the Gallery and Sculpture Garden); • new permanent development in the area will be part of a planned approach which is in keeping with the values of the area. Ad hoc development will be avoided... • new structures will not exceed the mature tree canopy in the vicinity or, in the case of the Parliamentary Zone, the RL of the height of the National Library, whichever is the higher... • temporary intrusions may be permitted however: <ul style="list-style-type: none"> • every effort will be made to maintain the values of the area during the period of the intrusion including the visual and aesthetic qualities, and including measures which can be taken during any down-time (eg. when an event has stopped for the day)... 	<p>Consistent – as noted below:</p> <ul style="list-style-type: none"> • the proposal is part of an evolving planned approach; and • the development will not exceed the mature tree canopy height. <p>Not fully consistent in the medium term –</p> <ul style="list-style-type: none"> • there are some impacts as a result of the loss of trees and informal landscape; • the proposal involves a temporary intrusion in the form of an exposed surface carpark at the upper level; • the longer term re-creation of an informal landscape character will mitigate the impact, although the trees in the re-created landscape will not be as tall when mature compared to current mature plantings.
<p>Policy 54 New parking New parking within the Parliament House Vista may be permitted provided that:</p> <ul style="list-style-type: none"> • generally, basement parking is to be provided in new buildings; • it is otherwise underground; • minor new surface parking may be provided as part of new building development; and • there is no nett encroachment into parkland areas in the case of new surface parking areas to replace existing areas, and new surface carparks will be screened. 	<p>Not fully consistent – as noted below:</p> <ul style="list-style-type: none"> • the new structure is only partly underground; • there will be surface parking as a temporary measure, and the extent is moderate; and • the temporary surface parking will only be partly screened in some views.

Other Comments

This proposal arises in the context of a major redevelopment at the Memorial, although it

is being treated as a separate project. The major redevelopment will be separately submitted for statutory consideration and/or approvals, including under the EPBC Act, at a later stage.

The issue in this broader context is the overall nature and level of heritage impacts considering both the proposed carpark and major redevelopment. This assessment only considers the impact of the proposed carpark, and it is beyond the current assessment to consider the major redevelopment and the overall or cumulative impacts of these two projects. None the less, the combined or cumulative impacts should be considered at some stage.

CONCLUSIONS

Having considered the proposed carpark works, it is concluded that the works will have:

- minor impacts, especially in the medium term, regarding several National Heritage values;
- moderate impacts in the medium term and minor impacts in the long term on a number of landscape values identified in the 2011 AWM heritage management plan; and
- have a minor impact, especially in the medium term, on one landscape value identified in the 2010 Parliament House Vista heritage management plan.

In all cases, the long term re-creation of an informal landscape character with native trees mitigates the impacts, although the trees in the re-created landscape will not be as tall when mature compared to current mature plantings.

Related to these impacts, the works will also be not consistent or not fully consistent, especially in the medium term, with all relevant policies and actions in the heritage management plans.

The different levels of impact, minor or moderate, arise depending on the context of the value being assessed. For example, the more specific a value is related to the area of the proposed works, the greater the possibility of a higher level of impact.

The detailed summary conclusions are that the works will:

- have minor impacts, especially in the medium term, regarding a number of National Heritage values, related to the removal of an area of the informal eastern precinct landscape;
- have no impact on other National Heritage values;
- have moderate impacts in the medium term and minor impacts in the long term on a number of landscape values identified in the 2011 AWM heritage management plan, related to the removal of up to 28 mature trees and the removal of an area of the informal eastern precinct landscape;
- have no impact on other landscape values in the AWM heritage management plan;
- have a minor impact, especially in the medium term, on one landscape value identified in the 2010 Parliament House Vista heritage management plan, related to the removal of an area of the informal eastern precinct landscape;
- be not consistent or not fully consistent, especially in the medium term, with a range of policies and actions in the AWM heritage management plan related to the impacts above;
- be consistent with other policies and actions in the AWM heritage management plan;

- be not fully consistent, especially in the medium term, with several policies in the Parliament House Vista heritage management plan; and
- be otherwise consistent with a relevant policy in the Parliament House Vista heritage management plan.

The inconsistencies noted above will also be mitigated by the long term re-creation of an informal landscape character with native trees.

While there are moderate impacts in the medium term, based on the apparent threshold being applied by the Department of the Environment and Energy, it seems likely these impacts would not be considered to be a significant impact within the meaning of the *Environment Protection and Biodiversity Conservation Act 1999*. In this context, an EPBC Act referral under Part 7 of the Act would not seem warranted unless certainty is required. None the less, because of the complexities of proposal, the National Heritage value of the Memorial, and the forthcoming and related major redevelopment, the AWM should consider further consulting the Department of the Environment and Energy.

In addition, these minor to moderate impacts do seem to constitute *adverse impacts* within the meaning of the Act. Section 341ZC states,

‘A Commonwealth agency must not take an action that has, will have or is likely to have an adverse impact on the National Heritage values of a National Heritage place or the Commonwealth Heritage values of a Commonwealth Heritage place, unless:

- (a) there is no feasible and prudent alternative to taking the action; and
- (b) all measures that can reasonably be taken to mitigate the impact of the action on those values are taken.’

With regard to the proposed works, options that might be worth considering, if they have not already been considered, include:

- reviewing the carpark design to maximise the retention of mature trees;
- reviewing the overall landscape of the eastern precinct to seek re-planting options which would be sympathetic with the conservation of the landscape values of the precinct, and also considering this in the context of the overall future landscape of the AWM site as part of the Parliament House Vista; and
- examining the possibility of temporary landscaping measures on the upper carpark level, or other mitigation measures, to help screen the exposed carpark area.

REFERENCES

GHD 2019, Australian War Memorial Redevelopment, Heritage Impact Assessment – Detailed Business Case, Reference Design, prepared for the Australian War Memorial.

Godden Mackay Logan 2008, Australian War Memorial, Eastern Precinct Development, Heritage Impact Statement, prepared for the Australian War Memorial.

Godden Mackay Logan 2011, Australian War Memorial Heritage Management Plan, prepared for the Australian War Memorial.

Marshall, D, C Burton, A Grinbergs, C Johnston, J Donkin, W Nicholls, B O’Keefe, R Boden, R Freestone, A Rowell 2010, Parliament House Vista area Heritage Management Plan, report for the National Capital Authority.

APPENDIX A: HERITAGE VALUES

There are many sources of information regarding the heritage values of the Memorial, either individually or as part of larger places. The following text regarding heritage values is drawn from a range of sources, as indicated.



Commonwealth Heritage Values – Australian War Memorial

Criterion A Processes

The Australian War Memorial is Australia's National Shrine to those Australians who lost their lives and suffered as a result of war.

Attributes

The whole building, setting and contents that illustrate Australia's historical involvement in war.

Criterion B Rarity

The Memorial building is a purpose built repository where the nature of commemoration is based in equal parts in the relationship between the building, the collections of objects and records and the commemorative spaces. This is unique in Australia and believed rare in the world.

Attributes

The equal relationship between the building, the collections of objects and records and the commemorative spaces.

Criterion D Characteristic values

The building is one of Canberra's earliest major examples of Australian Art Deco architecture, with fine examples of applied art in the same style. The building's design also successfully fulfils its special functions and reinforces the role of the place as a Shrine.

Attributes

Its architectural styling and design, plus its applied art.

Criterion E Aesthetic characteristics

The War Memorial is an important landmark in Canberra, Australia's National Capital. As the terminating building at the northern end of the land axis of Griffin's city design and one of only three buildings sited on the axis, the Memorial makes a major contribution to the principal views from both Parliament Houses.

Attributes

Its location as the terminating building at the northern end of the Land Axis.

Criterion F Technical achievement

The success of the Memorial as a landmark is due in part to its distinctive massing and symmetry; its relative visual isolation given its privileged siting on the land axis; landscaped grounds and the backdrop of the forested slopes of Mount Ainslie. The role of the Memorial as a National icon is reinforced by its central location in the nation's capital.

Attributes

Its distinctive massing and symmetry; its prominent siting on the Land Axis, its landscaped grounds and its setting against the backdrop of the forested slopes of Mount Ainslie.

Criterion G Social value

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.

Attributes

The whole building, including its commemorations, displays and records.

Criterion H Significant people

The Australian War Memorial has special associations with veterans and their families and descendants of those who fought in wars.

The Memorial's success as a shrine, an architectural form and as part of Canberra's urban plan results in part from special associations with the lives and works of a number of individuals whose activities have been significant in Australia's history. These include the Memorial's founders Charles Bean, John Treloar and Henry Gullett; architects Emil Sodersteen and John Crust; and M Napier Waller who created artworks for the building.

Attributes

The whole building, including its architectural design, its setting, its commemorations, its artworks, displays, memorabilia and archival records.

National Heritage Values – Australian War Memorial and the Memorial Parade

Criterion A Events, Processes

The AWM is an outstanding national museum and memorial, as expressed through the main building, the courtyard fabric, interior spaces, the Sculpture Garden and the collections. The AWM was established as a direct consequence of the First World War, one of the seminal events in Australian history. It embodied the vision of Charles Bean – Official First World War correspondent – that the war would be instrumental in creating a sense of nationhood and a distinctly Australian identity. The institution plays a pivotal role in helping Australians to commemorate and understand the sacrifice and loss of Australians during war.

The AWM together with Anzac Parade is an important national icon. Its major features include: the main building; the medieval stone lions at the entrance; the ceremonial landscape including the Lone Pine tree; and displays and sculptures. The AWM and Anzac Parade are major venues for national commemorative services and events such as the ANZAC Day march.

Anzac Parade, as part of the Parliamentary Vista and an extension of the AWM, is part of one of the major designed landscapes of Australia. A ceremonial space of this grandeur is unique in Australia.

The AWM and the memorials along Anzac Parade represent changing concepts of commemoration in Australia, influenced by the armed forces and community groups. The Hall of Memory with the Tomb of the Unknown Australian Soldier, and aspects of its setting are notable.

Criterion B Rarity

The AWM building is a purpose built repository, reflecting the integral relationship between the building, commemorative spaces and the collections. This is unique in Australia and rare elsewhere in the world. The values are expressed in the fabric of the main building, the entrance, the Hall of Memory, the collections and the surrounding landscape.

The AWM collection contains unique objects including a Lancaster bomber and the largest collection of Victoria Crosses in the world. The building contains rare elements, notably the medieval stone lions at the entrance and the Hall of Memory with its largest mosaics in the world.

Anzac Parade, as part of the Parliamentary Vista and as an extension of the AWM, is part of one of the major cultural landscapes of Australia. The grandeur of the ceremonial space is not found elsewhere in Australia. Anzac Parade is nationally important for its public and commemorative functions.

Criterion C Research

The AWM has a unique and important function in the nation in collecting and displaying objects and records on Australians' experience of war. The AWM and other institutions have used these materials to produce research on social, political and military history. The place has the potential to yield further substantial information on Australians' experience of war. These values are expressed through the collections.

Criterion E Aesthetic characteristics

The AWM in its setting is of outstanding importance for its aesthetic characteristics, valued as a place of great beauty by the Australian community and veteran groups (as represented by the Returned & Services League of Australia). The place has evoked strong emotional and artistic responses from Australian and overseas visitors. The main building and the surrounding landscape, the Hall of Memory, the Roll of

Honour, ANZAC Hall and the collections act as reminders of important events and people in Australia's history and trigger disturbing and poignant responses from the vast majority of visitors.

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.

Criterion G Social value

The AWM is the national war museum and national shrine, and together with Anzac Park, has special associations for the Australian community, particularly veterans and their families. These special associations are reinforced on ANZAC Day and at ceremonies specific to particular memorials on Anzac Parade. The AWM and the Anzac Parade memorials are the nation's major focal point for commemoration including the ANZAC Day march and other ceremonies and events. These values are expressed through: the AWM building (including the Hall of Memory); the collection; the surrounding landscape (including the Sculpture Garden); and Anzac Parade including the memorials.

Criterion H Significant people

The AWM building and the Anzac Parade memorials have special associations with Australia's military forces and veterans represented by the Returned & Services League of Australia.

The AWM's success as a shrine, a museum, an architectural form and part of Canberra's urban plan is partly the result of its special associations with the lives and works of people who have been significant in Australia's history. These include the AWM's founders Charles Bean, John Treloar and Sir Henry Gullett.

The values are expressed in the fabric of the place which includes: the main building; the Hall of Memory; the collections; the surrounding landscape; and Anzac Parade.

AWM Heritage Management Plan – 2011

Entire Site

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 the families and descendants of those who fought in wars.

The Memorial building is a purpose-built repository where the nature of commemoration is based in equal parts in the relationship between the building, the collections of objects and records, and the commemorative spaces. This is unique in Australia and is believed rare in the world. The AWM has a unique and important function in the nation in collecting and displaying objects and records on Australians' experience of war. The AWM and other institutions have used these materials to produce research on social, political and military history. The place has the potential to yield further substantial information on Australians' experience of war. These values are expressed through the collections.

The building is one of Canberra's earliest major examples of partial Australian Art Deco architecture, with fine examples of applied art in the same style. The building's design also successfully fulfils its special functions and reinforces the role of the place as a shrine. The War Memorial is an important landmark in Canberra, Australia's national capital. As the terminating building at the northern end of the land axis of Griffin's city design, and one of only three buildings sited on the axis, the Memorial makes a major contribution to the principal views from both Parliament Houses. The success of the Memorial as a landmark is due in part to its distinctive massing and symmetry; its relative visual isolation, given its privileged siting on the land axis; landscaped grounds; and the backdrop of the forested slopes of Mount Ainslie. The role of the Memorial as a national icon is reinforced by its central location in the nation's capital. The Memorial's success as a shrine, an architectural form, and as part of Canberra's urban plan results in part from special associations with the lives and works of a number of individuals whose activities have been significant in Australia's history. These include the Memorial's founders CEW Bean, John Treloar and Henry Gullett; architects Emil Sodersteen and John Crust; and M Napier Waller, who created artworks for the building. (GML 2011, p. 39)

...

Landscape

The landscape of the AWM has evolved slowly since the 1940s and no design scheme is yet to be fully realised. The current layout contains elements of historic importance such as the sculptures in the Sculpture Garden and the Lone Pine, and select areas of the landscape meet the threshold for historical value, but overall the wider landscape currently does not meet the threshold for historical value.

The central Parade Ground, the mature plantings, the Sculpture Garden, the location of the landscape at the foot of Mount Ainslie and at the terminus of the Parliament House Vista and land axis, all contribute to the high aesthetic values of this landscape in its broader setting. The Parade Ground represents a high level of technical and creative achievement as a successful response to the requirements and qualities of the site.

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

As the site has been considerably altered and disturbed by construction, most evidence of past Indigenous use of this landscape has been destroyed. A single artefact was discovered near the property boundary during consultation with Indigenous representatives, which has value to community members. (GML 2011, p. 41)

...

The landscape of the AWM Campbell Precinct primarily has aesthetic heritage values. The aesthetic values of this precinct are the formal characteristics of the Western Precinct contrasting with the informality of the Eastern Precinct. The Precinct has an important contribution to the values of the Parliament House Vista.

In addition to aesthetic values of the landscape the western precinct has aesthetic values in its sculptures, historic values in its memorials and the Lone Pine and social values in the memorials and Parade Ground. (GML 2011, p. 84)

...

To the east of the Memorial planting has been developed using eucalypts and wattles to give the appearance of an extension of the natural vegetation of Mount Ainslie, as proposed in the planting plans of 1952. (GML 2011, p. 25)

Parliament House Vista Heritage Management Plan – 2010

The Parliament House Vista area is a large and complex landscape with a range of values related to its history and historical associations, unique evolving design, aesthetic value, creative achievement and social value. Some of these are of outstanding value to the nation (potential National Heritage) while others are of significant heritage value (Commonwealth Heritage). The area contains many places of recognised and individual heritage significance, many of which contribute to the values of the broader area.

The Parliament House Vista is of outstanding heritage value to the nation because it is strongly associated with and a focus of the history of politics and government in Australia, the development of Australian cultural life and national identity, and the development of Canberra as Australia's national capital, including the initial design by Walter and Marion Griffin for the city (1911, later revised), and subsequent designs notably by William Holford and the National Capital Development Commission. The result is a layering of designs which have built upon or consciously departed from the Griffins. This complex, evolving design is an important part of the story of the national capital and the Parliament House Vista in particular.

Canberra was created following 1911 as the new Australian national capital. It was based on the Griffins' design for the city and the Parliament House Vista contains the core of this design as realised. The Parliament House Vista is the heart of the national capital and contains prominent national institutions such as Old Parliament House which was the home of the Commonwealth Parliament from 1927-88, the Australian War Memorial from 1941, as well as many other national institutions and government office buildings. It is also the location for a large range of other memorials and commemorative plantings dating back to the 1920s, and the area continues to be the focus of such activities. The area is also significantly associated with political protest, especially in the vicinity of Parkes Place.

The Parliament House Vista is of outstanding heritage value to the nation because of its landscape history which is:

- unique within Australia as an ongoing realisation of the establishment of a national place in an attempt to give a strong identity to the core of the national capital;
- a record of an evolution of different ideas in landscape design in Australia from the Federation Period to the present, related also to the development of Landscape Architecture as a profession in Australia; and
- it is unparalleled in any other Australian city because the physical evolution has allowed a tradition of landscape architecture and horticulture to be developed.

(Criterion (a))

The landscape of the Parliament House Vista is arguably of outstanding heritage value as it is unique within Australia as a designed national place, or indeed as a series of component national places, evolving over time and contributing to this larger national landscape.

(Criterion (b))

The Parliament House Vista is of significant heritage value to the Canberra community for its aesthetic qualities. It evokes an emotional response from the community for whom it is a place of dramatic and powerful views, such as the large scale and sweeping views along the Land Axis to the terminal features, and also a place of reflection and contemplation. They value the juxtaposition of bush with the formality of the built environment. The aesthetic values specific to the design and setting of the Parliament House Vista are also recognised, along with the integration of the architectural elements into the overall Griffins' design.

The Canberra community and, in particular, the veterans/family of veterans among them, value the visual link between the Parliament House and the Australian War Memorial which represents the democratic values of the Australian nation and the sacrifices made to uphold them.

The Parliament House Vista is of outstanding value to the nation because of its aesthetic values to Australians. It is the most highly recognised part of Canberra for Australians – evoking Canberra and its important meanings and associations. Its aesthetic values as a symbolic and powerful landscape are clearly evidenced in the high recognition of the Parliament House Vista. The aesthetic characteristics of the Parliament House Vista are strongly connected to its symbolic meanings, and are highly recognised and valued by Australians.

(Criterion (c))

The Parliament House Vista is of outstanding heritage value because of its creative achievement as a complex of gardens, united by landscape design, intimately bound into the architectonic structure of the various precincts, and set within the context of the National Triangle parklands. The area has evolved through layers of natural history, planning concepts and human use – as the Griffins' core organising principle of the intersecting Land and Water Axes. The Parliament House Vista is significant as an example of City Beautiful urban planning with Garden City influences. It displays design excellence through the use of natural features to generate a strong planning geometry and broad symmetry which is reinforced by introduced features such as the lake, buildings, plantings, parklands, gardens and road system. There is a masterly synthesis and ordering of topography and functions creating a symbolic and visually dramatic landscape.

The study area is important for components and qualities reflecting modern or twentieth century planning and urban design, many of which relate to the landscape. The Griffins' design responded creatively to the landscape features of the site, and the form of the city being in the landscape and provision of extensive open spaces both reflect the development of modern town planning from the early twentieth century. Indeed, the design contained the most dramatic and compelling assemblage of modern town planning ideals. The Griffins' design provides the foundations for the current Parliament House Vista area. Some core elements or qualities of this design have been realised although later significant planning contributions have now produced the layered landscape experienced today.

The Parliament House Vista is important for its design pattern of large landscapes and waterscapes with treed avenues and bridges providing framing elements, the terminal vista features of the Australian War Memorial and Mount Ainslie at the northern end and Parliament House at the southern end, and with the Carillon and Captain Cook Memorial Water Jet creating balanced vertical features in the water plane.

Avenues of trees and Lombardy Poplars as sentinels at key locations provide colour, character and contrast – all emphasising the symmetrical design – and the green/irrigated grass, especially of the Land Axis, makes a strong contribution to the composition. There are many important smaller component parklands and gardens which enhance the landscape with rich details of texture, colour, fragrance and in some cases, art works and water features.

The Parliament House Vista study area demonstrates different approaches to landscape design in an attempt to create a distinctive identity for the core of the national area, and integrate them into a harmonious composition as open space at the scale of the indigenous open forest/woodland structure of the region. In addition, these designs seek to provide an appropriate scale for the built elements in an integrated way, reflecting the tradition of the City Beautiful Movement.

A balance of formal and informal landscape treatment has been achieved through the integration of indigenous natural values and cultural values.

These many features provide a rich texture to the Parliament House Vista.

(Criterion (f))

The Parliament House Vista has significant social heritage value for both the Canberra and Australian communities.

The Parliament House Vista is of social significance to the Canberra community as a place which represents and embodies the ideals of Australian values and nationhood. The Canberra community values the Parliament House Vista as an icon and landmark and as the heart of the city.

The Parliament House Vista is a place which the Canberra community values as an important element in the continuum of both local and national history. This sense of history and of place engenders feelings of belonging and pride and the Canberra community feels it holds the layers of values and stories, as embodied in the area, in trust for the nation.

The Parliament House Vista is valued highly for its accessibility, as a gathering and meeting place, and as a beautiful place in which to be. The Canberra community has a deep attachment to the idea that the Parliament House Vista is a place for all Australians.

The Parliament House Vista is an iconic image of Canberra which represents the city to the nation and, potentially, internationally. For those Australians who have visited Canberra, the Parliament House Vista is the central iconic image representing a key element of the overall Griffins' design for Canberra, the nation's capital.

(Criterion (g))

The study area has outstanding heritage value for its special association with Walter Burley Griffin. Griffin was the lead designer of the original plan for Canberra as the national capital, and the Parliament House Vista is the core of the design and is probably the major part of the design which has actually been realised.

The Parliament House Vista also has significant heritage value for its special associations with:

- Sylvia Crowe, an important landscape architect, especially in Britain but also in Australia – responsible for the masterplan for Commonwealth Park, apparently her only Australian design and a major component of the study area;
- John Crust and Emil Sodersten, as important architects, especially for their design of the Australian War Memorial – this being a crucial and prominent building in the Parliament House Vista;
- Marion Mahony Griffin, important as the contributing designer of the original plan for Canberra as the national capital, including especially the Parliament House Vista;
- William Holford, a leading British architect and town planner who is important for his influence on the design of Canberra as the national capital, including in particular the Parliament House Vista;
- John Smith Murdoch, an early and significant architect in the Commonwealth Government – designer of the Old Parliament House and East and West Blocks, being a crucial and prominent group of buildings in the development of the area;
- National Capital Development Commission staff, who played key role in planning, developing and constructing Canberra including a large number of major components within the study area, or which

- have otherwise had a major impact on the area;
- Harry Oakman, an important landscape designer and author, instrumental in the development of Commonwealth Park and other landscaping in the Parliament House Vista;
 - John Overall, who led the NCDC during its foundation period which saw a dramatic acceleration in the development of Canberra after a long period of neglect, including in particular completion of Lake Burley Griffin;
 - John Sulman, an important architect and town planner who played a major role in the development of Canberra – a key advocate for the Old Parliament House development, being a prominent building in the study area; and
 - Thomas Charles George Weston, an important figure being responsible for the early detailed plantings which are a major feature of Canberra, including notably the Parliamentary Zone.

(Criterion (h))

(Marshall and other 2011, vol. 1 p. 181-4)