NATIONAL TRUST of AUSTRALIA (AUSTRALIAN CAPITAL TERRITORY) ABN 50 797 949 955



Unit 2.03, Level 2, Griffin Centre 20 Genge Street, Canberra ACT 2600

PO BOX 1144 CIVIC SQUARE ACT 2608

EMAIL: <u>info@nationaltrustact.org.au</u> WEB: www.nationaltrustact.org.au

T: 02 6230 0533

PATRON: The Hon Margaret Reid AO

Have Your Say

National Capital Authority

AUSTRALIAN WAR MEMORIAL MAIN WORKS

The National Trust of Australia (ACT) notes the proposed extensions & alterations to the Australian War Memorial and does not support either the proposed changes to the front entry or the replacement of Anzac Hall, and makes the following comments:

1. Section 10 of the Planning Report Heritage & Environmental values states the "new built form will not alter the character of the site" is completely incorrect.

The main entry to the end of Anzac Parade is a massive change and totally changes the view from Anzac Parade (refer drawing A9001). Similarly, the new Anzac Hall is a massive change and envelopes the rear section of the Australian War Memorial and will totally dominate the view from Mt Ainslie (refer drawing WA-A-90).

We dispute the comment that the proposal is "in accordance with Commonwealth Heritage Management Principles, the Burra Charter and the Memorials HMP"

We do not agree that it has "respect for the physical heritage values of the institution" which is also evidenced by the two drawings referenced above. How this statement if reconciled by the following comment "the replacement of Anzac Hall has a significant impact on heritage values" is totally mystifying. The suggestion that the so called adverse physical impact is balanced by positive social values is not justified or supported by evidence.

The so-called reversibility of the glazed link which physically attaches to the existing building and the opportunity provided for a greater appreciation of the north wall is not justified as the glazed link will be totally enclosed the north elevation and prevent it being clearly visible from outside as it is now. The appreciation of the existing building in a landscape will be lost forever and dwarfed by the new extension and glassed link.

The removal of some plant areas adjacent the existing building is supported.

2. Heritage Impact Statement Version 3.2 – 19/4/2021

We note that this was prepared 4 months before the works approval submission and acknowledges in 1.4 that it relates to the design in April 2021 and not the final design and that "it is not possible to make a complete assessment of the impact of the proposed changes"

This raises questions on the validity of the report and serious doubts as to if it is best practice and consistent with the Burra Charter and Heritage Management Principles.

Section 4 fails to acknowledge the massive changes to the setting and presentation of the Australian War Memorial from its principle viewing point, Anzac Parade. While it states it makes little change to the external presentation of the main building, drawing 0230 shows removal of the existing front stairs, the plinths either side and the central section of the current entry, all of which are the existing main entry and ceremonial area which is part of the original design.

The impact of the new entry is great as mentioned in 1 above.

The argument that it enhances historical and iconic purposes is no justification for the physical impact.

The imposition of the glazed link at the rear may not alter the physical fabric much but it has a huge impact on the setting and is acknowledge as having a "significant impact".

We do not agree with the comment in 4.1 that the new Anzac Hall and glazed link enhance the heritage values. The argument that it provides space for a larger display is not enhancement of the existing heritage values which in part is with the physical form and fabric.

It is noted that there are detrimental impacts (Section 4.2) and these should result in a complete review of the whole design. The protrusion of the oculus in front of the building is a major intrusion.

The fact that the glazed link will be somewhat visible along the land axis is alarming. The fact that it will reflect light and be clearly noticeable even if a relatively small projection has not been considered in the assessment. How the plan forms of the glazed link follows the main building is mystifying.

The discussion on the Heritage Impact assessment against National Heritage Management principles (Section 5) Sub clause 2 fails logic as exhibition requirements do not justify the need to impact on other fundamental heritage values.

The comments made are not consistent with the impacts on heritage values acknowledged in earlier parts of the report and mentioned above.

Sub clause 3 states that only National & Commonwealth values are relevant, yet section 6 uses Heritage NSW questions which is an interesting process.

Table 7.1 refers to the impact on the main building as neutral, yet the earlier evidence acknowledges adverse impacts on several items.

The impact on Anzac Parade is not considered low as it is a total new design to the south entry and demolition of significant elements of the original design.

The aesthetic impacts stated as low is not supported by previous comments that there are significant impacts.

It is pleasing to note that the loss of Anzac Hall is acknowledged as a huge impact but the fact that is has already started clearly indicates that the report is out of date.

Similar arguments and comments are made in the assessment against Commonwealth Values as those commented on above.

The comments against the conservation policies in the HMP are noted particularly that several only partially comply and we believe there has been an under assessment of critical impacts as mentioned above.

We do not see how the conclusion can be positive for the proposed development.

3. EPBC National Consultation Report

The report appears focused on establishing social interaction with veterans and not addressing the impact on the physical place or setting. A social support to a larger memorial does not need to have an adverse impact on the heritage values of design, fabric and setting but in this situation it has.

4. CONCLUSION

The supporting evidence on heritage issues appears weak and inconsistent. It is unfortunate that it appears to be written to justify a predetermined outcome rather than a professional and objective report. The fact that it was prepared 4 months before the design was finalised and submitted is alarming.

We are not convinced by the evidence provided that this design can be supported or should be approved as the impact on heritage values is significant.

If you would be willing to consider this opportunity and would like more information, please contact me at president@nationaltrustact.org.au or on 0419 854 211.

Yours faithfully

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Eric Martin, AM Councillor

10 September 2021

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Gary Kent President