



30 April, 2021

Submission of MAPW (Australia) to the National Capital Authority, regarding the Australian War Memorial application for “early works”

The Medical Association for Prevention of War (Australia) works for the elimination of all weapons of mass destruction and the prevention of armed conflict. We are the Australian affiliate of International Physicians for the Prevention of Nuclear War (Nobel Peace Prize 1985) and the founder of ICAN, the International Campaign to Abolish Nuclear Weapons (Nobel Peace Prize 2017).

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SUMMARY

The proposed “early works” at the AWM should be categorically rejected, as they are an integral part of the proposed AWM redevelopment which has not yet been authorised.

Anything less than this would be a sheer travesty, for which the NCA would rightly be characterised as nothing more than an unprincipled rubber stamp.

In addition, the proposed “early works” would violate important National Capital Plan environmental and other principles.

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THE “EARLY WORKS” APPROVAL PROCESS

The proposed AWM “early works” are a series of irreversible steps that make sense only in the context of the proposed redevelopment as a whole, which is yet to be fully approved. They cannot be considered in isolation. If the “early works” are approved, the NCA will subsequently be in the position of deciding whether an institution whose partial demolition it has authorised should be rebuilt – an absurd prospect which makes a mockery of any claim to “due process”.

The current process is all the more unacceptable by the difficulty submitters have in knowing what exactly they should be addressing. The NCA states that it is not currently considering the need for the AWM redevelopment as a whole, but only the “early works”. How can submitters simply consider a series of irreversible and destructive steps while ignoring the far bigger context and the planned replacement?

Despite MAPW’s email correspondence with the NCA on this matter, the answer to that question is not clear. MAPW has been informed that submitters should consider the provisions of the National Capital Plan which sets out planning and design requirements. However, these also make sense only in relation to whole projects, not bits and pieces sliced off in a piecemeal fashion. If the NCA is proceeding on the basis that there is already an approved development to follow, then the Australian community have been misled and the current “early works” approval process is even more reprehensible.

In addition, very few community members would be familiar with the detail of the National Capital Plan, and yet they should not be disenfranchised for that reason on a matter of such national significance and controversy as this.

It is unfortunate also that the NCA’s email to stakeholders on 19 March, inviting submissions, astonishingly made no mention of the proposed destruction of Anzac Hall, nor the scale of proposed tree removals; these things were apparent only on a careful reading of the documentation. For such a controversial and strongly opposed project, this did not appear to be in the spirit of a robust consultation process.

The NCA has regrettably already been complicit to some extent by approving other “early works” for this project before the project is approved. It is to be hoped that this pattern does not continue with such major works as are currently proposed as “early works”.

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COMMENTS IN RELATION TO THE NATIONAL CAPITAL PLAN

The following comments in relation to the National Capital Plan (NCP) apply to both the proposed “early works” and the proposed AWM redevelopment; as stated, it is not possible to separate the two.

- **Canberra’s bush surrounds, its landscape setting, and environmental values**

NCP (page 15): “Retain the distinct urban form for which Canberra is well known, of a city within bush surrounds”

NCP (page 16): “Protect the nationally significant open-space network, visual backdrop and landscape setting of the National Capital”

NCP (page 16) “Ensure the development of a city that both respects environmental values and reflects national concerns with the sustainability of Australia’s urban areas”

Many of our war dead were intimately connected to, and loved, the Australian bush environment. The proposed destruction of well over 100 trees in the Memorial grounds, many of them mature eucalypts that contribute a distinctly Australian setting, would violate the above principles.

The Preliminary Arboriculture Assessment shows that of the trees 'likely to be removed', most of them are in good or very good condition. Any replacement plantings would take decades to reach similar stature and grandeur of those that currently adorn and soften the AWM landscape and provide a quintessentially Australian setting.

Such destruction would also show disrespect for the AWM’s unique location and vistas. A virtually denuded landscape at the top of Anzac Parade, with, at best, immature plantings for many years to come, would be a far cry from the current vista. At the front of the Memorial, the massive excavation and enlarged parade ground that are proposed would drastically encroach on the bush setting. The new façade of the Memorial, and the likely visibility of the glazed link behind and above the main building, would further detract from the iconic current vista. On the other side of the Memorial, behind Anzac Hall, the removal of trees would add a further level of destruction of the bush environment which links the AWM to the base of Mount Ainslie.

These “early works” are simply vandalism writ large, made all the worse by being at a place of great national significance and in a very nationally prominent location.

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While Canberrans on suburban blocks often face great difficulty in getting approval for the removal of a single mature tree, the AWM is proposing to almost denude this very large, extremely prominent and important location in one fell swoop.

This must not be allowed. The “early works” should be categorically rejected.

- *Reducing resource consumption and waste*

NCP (page 16): “The natural environment of Canberra and the Territory will be protected and improved by reducing resource consumption and waste”

The proposed destruction of the seemingly fit-for-purpose and award-winning Anzac Hall, which has been in use for less than 20 years, violates the Plan’s goal of reducing resource consumption and waste. It is unsustainable for the AWM to grow to accommodate every new war at the rate of around 24,000 square metres (the current proposed addition) every 20 years. If indeed Anzac Hall is no longer fit-for-purpose, due to the rate at which Australia joins new wars, will Anzac Hall’s replacement also be up for demolition in 20 years’ time? Is the NCA considering such future possibilities?

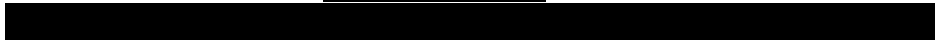
- *The symbolism and dignity of the National Capital*

NCP (page 17): “Substantial works of architecture, engineering and landscape within the Territory should be designed to contribute positively to the overall composition, symbolism and dignity of the National Capital.”

The symbolism and dignity of the National Capital are extremely important. What we choose to emphasise, including in our national institutions, can say a lot about us as a nation.

The proposed redevelopment, of which the “early works” are a part, represents an attack on the symbolism and dignity of our national capital. The grandiose plans to greatly expand the AWM, with the machinery of warfare featured prominently, would continue a dangerous trend away from symbolising a nation that strives for and honours peace, towards one for whom war is the defining activity. The powerful simplicity of a focus on war commemoration would become overshadowed.

Frequent references from the AWM leadership to the Memorial representing “the soul of



the nation”, and the use of such imagery to justify a heavily militarised expansion, are of grave concern. All of Canberra’s cultural institutions contribute unique elements that collectively present a rich and diverse history of which warfare is simply a part, and yet we risk a greatly disproportionate emphasis on warfare by the dominating scale and design of the proposed AWM expansion.

MAPW notes that both the government’s own heritage advisers, the Australian Heritage Council, and the heritage section within the Department of Agriculture, Water and the Environment advised of significant heritage impacts from the proposed redevelopment. The experts within the Department indicated that it would reduce the importance of the original iconic stone commemorative building and pull the focus away from commemoration. That such an outcome is even being contemplated at our nation’s principal place of war commemoration, notwithstanding Minister Ley’s totally inadequate response, is appalling.

Public comments from diverse commentators about the AWM becoming a military theme park rather than a memorial are now so widespread that they should no longer be ignored. A military theme park – as many people are perceiving the proposed redevelopment - is fitting for a military dictatorship; it has no place in Australia’s national capital.

- ***Symbolism and dignity – the importance of democratic decision-making***

There is an additional concern that is highly relevant to Canberra’s dignity and symbolism – that of preserving Canberra as a place of democratic decision-making. The importance of this is reflected in the AWM’s email to stakeholders on 19 March, which stated that *“the NCA’s statutory functions give it the capacity to ensure national assets ...are of an appropriate standard, meet the expectations of users, support appreciation and understanding of the role of ...our democracy”*.

It is ironic that the AWM itself has greatly damaged the democratic decision-making process by, among other things, grossly misrepresenting public sentiment about this project. AWM surveys have been characterised by extremely leading questions, lack of critical information and counter arguments, and minimal capacity for negative responses.

There has been a “done deal” mentality about the project from the very start, which has left many people confused about exactly what they are being “consulted” on. Unfortunately



this appears to have been aided by the NCA, not least by the current ridiculous pretence that destructive and irreversible “early works” can be considered in isolation from the redevelopment project as a whole.

The decision-making process for the proposed AWM redevelopment is already recorded for all time as a travesty of democracy. The history of the process will forever taint the Memorial itself. It is to be hoped that the NCA can salvage some semblance of democracy and good sense at this late hour by categorically rejecting the current “early works” application.

When the AWM applies to the NCA for approval to proceed with the redevelopment, there should be a genuine and broad consultation process organised totally independently of the AWM. Unfortunately the management of the Memorial has shown itself untrustworthy with such a process.

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