From: Lex Beardsell

Sent: Thursday, 29 April 2021 10:17 PM
To: Works Approval Consultation

Subject: Redevelopment of Australian War Memorial

Categories: Green category, Orange category

To whom it may concern

I am an Australian citizen and have lived in Canberra for the last 49 years. My interest in the redevelopment of The Australian War Memorial stems from the fact that my father's name is on the Honour Roll - Alexander James Coto and I have been the wife of an Australian veteran for the last 57 years. I believe that the Memorial as it stands provides an invaluable institution for Australia to honour those who have served and died for there country in military service. Any extension would change the nature of the institution and is uncalled for. Please take notice of these objections to the redevelopment from not only me but many others.

Lex Beardsell

From:
Sent: Wednesday, 28 April 2021 10:51 AM
To: Works Approval Consultation
Subject: War Memorial proposed alterations.

Categories: Green category, Orange category

I would just like to add my voice to the many experts, war historians, architects and former senior War Memorial staff who have objected to the proposed alterations at the War Memorial. The NCA is the last body who can put a stop to this appalling decision to further transform this wonderful memorial to those who have served in wartime conflicts into a theme park dedicated to exhibiting wartime gadgetry.

If the government feels it should have a site to show off the larger armaments that have been used in wars why on earth don't they expand the already functioning space that they have operating in Mitchell. Apart from costing much less than the current proposals to radically alter the War Memorial, such a decision would separate the function of the Memorial as a place that honours the memory of those who have served and died in the service of Australia and the function of a war museum which exhibits and curates artifacts used in wars.

I would plead with the NCA to help stop this proposed desecration of our wonderful War Memorial.

Yours Sincerely

Dr Geoffrey Borny



From: Gabrielle Hyslop

Sent: Wednesday, 28 April 2021 1:43 PM
To: Works Approval Consultation

Subject: War Memorial

Categories: Green category, Orange category

Hello NCA consultants

I wish to join the overwhelming number of highly qualified people who strenuously object to the proposed changes to the War Memorial.

Anzac Hall is one of the most successful and popular galleries in the Memorial, capable not only of exhibiting large objects from the collection but also interpreting them in an informative and profoundly moving fashion. Museum professionalism at its peak.

No collecting institution can display all of its collection, but in the case of the Memorial, not only are significant objects displayed on the Campbell site, but they are also made available to the public at Mitchell. The highly successful open days there have not only enabled people to see large and important objects but have also given the public the frisson of seeing "behind the scenes", observing things that are not always available and also watching experts restore them. This capability should be developed.

In this way there would be no need to vandalise the existing public building with its exceptional heritage, architectural and museological values. There had been no widespread public outcry calling for the extension of the Memorial. In its existing manifestation it is a fine site as both a shrine and a world class museum.

I urge you to reverse the decision to go ahead with this proposed development.

Gabrielle Hyslop

Member, Australian Museums and Galleries

From:

Chrisannelombard Thursday, 8 April 2021 5:06 PM Sent: Works Approval Consultation To:

Subject: Stop the early works for the War Memorial redevelopment

Categories: Orange category, Green category

To whom it may concern,

I am writing as a resident of Canberra to express my opposition to the early works proposed at the War Memorial.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the ancient eucalypts that surround the area should be prioritised.

I also believe the NCA should release a response to all submissions it receives on this issue.

Regards, Chrissie Guillaume From:

Graham Lindsay Friday, 30 April 2021 1:13 PM Sent: Works Approval Consultation To:

Stop the early works for the War Memorial redevelopment Subject:

Categories: Green category, Orange category

I am writing as a resident of Canberra to express my opposition to the early works proposed at the War Memorial.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the eucalypts that surround the area should be prioritised.

I also believe the NCA should release a response to all submissions it receives on this issue.

I also consider many of the changes to the War Memorial to be a waste of taxpayers' money and that the proposed extensions and changes will pervert the real meaning of the War Memorial to all Australians. It is not there to glorify our participation in war but as a way of remembering those who were required to serve in war zones for their country's sake. It should remain a quiet place of solemn reflection, and to ponder on the importance of peace.

Jan and Graham Lindsay	

Sincerely

From: Douglas Newton

Sent: Tuesday, 27 April 2021 11:46 AM
To: Works Approval Consultation
Subject: AWM "early works" development

Categories: Green category, Orange category

Dear Works Approval Team,

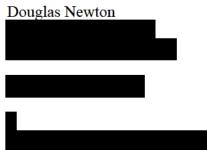
I write to express my disappointment that the National Capital Authority appears to be on the verge of approving what are euphemistically entitled "early works" associated with the 'Our Continuing Story".

I note that Minister Sussan Ley has approved the proposal, and that the Public Works Committee of the parliament has considered it also (with a dissenting minority report, as I understand it). I realise also that the most essential matters, the need for and the cost of the project are outside the brief of the NCA. But it should be recorded that this means sidelining the vehement opposition of key figures, such as Steve Gower and Brendon Kelson, former Directors of the AWM, and Admiral Chris Barrie, former Chief of the Defence Force, who spoke powerfully for veterans against this development on RN Breakfast radio only last Friday. One cannot resist the conclusion that the powerful financial and media interests that now dominate at the AWM have ridden roughshod over those with real expertise and experience, and those genuinely in touch with opinion among veterans beyond those specially selected by public relations firms for an appearance in promotional videos.

That said, it is astonishing that "early works" could include a PDF plan of the works that bluntly lists Anzac Hall as "TO BE DEMOLISHED" - an exhibition space of 3,000 square metres, less than 20 years old, and a space which the Heritage Impact Statement describes inconsistently as feeling "somewhat cluttered inside, at present, despite the cavernous nature of the space" (p. 6). More imaginative use of the space is not considered. Apparently, it must go. As the Heritage Impact Statement itself made clear, the demolition of Anzac Hall will "represent a very considerable loss of fabric that is of aesthetic value" (p. 15). In all honesty, a concerned citizen must ask: how is it remotely possible to include an application to demolish the hall, the most contentious part of the whole project, in an application of "early works"? The good faith of the application is surely open to question.

On top of this, needless to say the excavations and destruction of so many healthy trees in this loved location is also lamentable. Here, where so much is in harmony with the setting, in size and scale all so appropriate, a scarred landscape will be produced, in order to make way for a highly dubious redevelopment. An approval of such sweeping "early works" will be regretted by countless thousands of citizens.

Best wishes,



SUBMISSION TO NATIONAL CAPITAL AUTHORITY APPLICATION FOR WORKS APPROVAL BLOCK 3 SECTION 39 CAMPBELL – AUSTRALIAN WAR MEMORIAL

Submitter:	
Christine Vincent	

- 1. I note the Terms of Reference for this "Public Consultation" particularly in relation to "demolition" (of Anzac Hall) and "tree removal" which are two of the four proposed Works in the approval application.
- 2. I also note that "the need for the expansion or the cost of the development are not matters for the NCA to <u>reconsider</u>". At what time did the NCA consider these two issues and what public consultation was undertaken by the NCA (as separate from any consultation undertaken by the Australian War Memorial to support its wish to expand)? As the main planning body for the Australian Capital Territory, I suggest that these two issues are the fundamental starting point for any planning to take place on this important Australian Heritage site, yet it appears that the NCA has only been brought into the picture when planning decisions have been made by other non-planning bodies and the NCA is required to be a rubber stamp when Works Approvals are sought.
- 3. The Terms of Reference state that "The (National Capital) Plan focuses on planning matters and quality of design" yet it appears that there has been no NCA input to the planning or design process. Is this correct?
- 4. The Knight Frank Application Planning Report which forms the basis for the Works Application provides background information about the evolution of

the Australian War Memorial (Chapter 7). Chapter 8 outlines the Development Project with key reasons why the Project is required, and Chapter 9 details the Need for the Works including details as to why the current award winning Anzac Hall is to be demolished. However, these are issues about which the public has been advised are not to be addressed in submissions. The NCA is not countenancing any discussion about the Need for the Works or why Anzac Hall is to be demolished because the new Cox design about which there has been no NCA public consultation has already been accepted.

- 5. Why has the NCA gone to "Public Consultation" on the Works Approval for the demolition of Anzac Hall? Given the current situation could there possibly be a decision taken by the NCA that Anzac Hall will not be demolished? Or are we once again ticking the Public Consultation Done box, with the NCA answer always being "comment noted" ... with no changes made.
- 6. Why is it that the NCA is calling for Public Submissions on Works
 Applications in stages rather than having a holistic approach to look at the
 entire Project first, then the staged Works? As others have commented, by
 the time the next stage is being considered the demolition of Anzac Hall and
 the 100 trees will have taken place. Surely this is Planning in reverse.
- 7. I fully support the submission of Dr Shane West to this Public Consultation and for brevity will not repeat the details but wish his submission and attachments to be included as integral to my submission.
- 8. I also support the words from Dr Sue Wareham and Professor Peter Stanley and the Australian Institute of Architects who have all expressed very cogent views as to why this proposed development should be put on hold. I will not repeat their arguments, about which the NCA is fully aware. These are serious people with views that should not be lightly dismissed. We need to have a re-think and look at alternative, less costly ways to achieve the

desired outcome for the AWM to reflect on the long and proud history of our military. This does not need to include vast spaces to house "large technology objects"; perhaps the majority of these could be securely displayed in an outside memorial park!

- 9. I also call for the NCA to extend the submission deadline to ensure that all Australians have the opportunity to express their views now that more information is available through the media.
- 10. I implore the NCA to not publish another Consultation Report which "notes and dismisses" public comments with NIL changes made.

Finally I should say that my great uncle is among the war dead commemorated on the Anzac Wall and it is moving to see his name in lights from time to time on the AWM façade – an appreciated gesture. His brother, my grandfather was awarded the Military Medal for "magnificent work and outstanding bravery" during the attack of the 31st Battalion from Warfusse-Abancourt in August 1918, so I am one of hundreds of thousands who have a direct link to the Memorial and only wish for the very best outcome for the future.

Christine Vincent

From: Ben Corry

Sent: Thursday, 8 April 2021 9:48 AM
To: Works Approval Consultation

Subject: Need to pause and rethink War memorial development.

Categories: Orange category, Green category

I am writing as a resident of Canberra to express my opposition to the early works proposed at the War Memorial.

I am deeply troubled by the process that led to almost a billion dollars being committed to this project, and the destruction of an already highly functional and suitable space in ANZAC hall. At a time when money is in short supply, continuing with the unnecessary war memorial development, when it is already outstanding and highly functional is deeply insulting to the Canberra and Australian community.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the ancient eucalypts that surround the area should be prioritised.

I also believe the NCA should release a response to all submissions it receives on this issue.

Regards, Ben Corry From: herman safransky

Sent: Wednesday, 28 April 2021 8:27 PM
To: Works Approval Consultation

Subject: Proposed extension to War Memorial

Categories: Green category, Orange category

I am writing as a resident concerning the proposed expansion of the War Memorial. I find it incredibly disheartening that instead of maintaining the current function of the War Memorial as a memorial and tribute to Australians who have lost their lives in past wars the proposed expansion seems to be about creating a museum of large war aircraft, already housed at Mitchell, that has no place in remembrance of the dead and those whose lives have been so drastically affected by war. The current structures can easily house any expansion in keeping with the original purpose of a memorial and not change it to create a Disneyland for war planes.

To destroy an award winning hall that has been funded by public money, has been constructed as a low lying and subtle building in keeping with the need to not impact on the profile of the War Memorial and has been in existence less than two decades is absolutely appalling! I personally do not want to see the open space and the view and impact of the memorial as originally intended destroyed by a larger Disneyland like structure

I am also thoroughly dismayed by the trees that are going to be destroyed in this process. It takes 80 years or more before trees can provide hollows for mammals and birds yet it is proposed to destroy so many mature native trees in the face of climate change and the ever decreasing tree cover in Canberra. There is absolutely no excuse for this environmental destruction.

I urge the NCA to stop this bloated, destructive and environmentally insensitive expansion.

Yours sincerely, Herman Safransky From: Angela Woollacott

Sent: Thursday, 1 April 2021 5:59 PM Works Approval Consultation

Subject: 'Early works' application should be refused

Categories: Orange category, Green category

Dear National Capital Authority,

I write to oppose vigorously the application for 'Early Works' in the redevelopment project at the Australian War Memorial. I believe that the works proposed do NOT constitute simply 'early works', but rather a large and intrinsic part of the bigger project. They will do serious, irreversible damage to the War Memorial.

The demolition of the award-winning Anzac Hall can hardly be classed as an 'early work'. It is a highly controversial, key part of the whole project. Architects, historians and community members around the country have expressed their strong opposition to having the Hall demolished. It must not been done while the whole project is still being debated.

Further, the removal of scores of trees is also a large part of the project itself. Removing many trees that have recently been assessed as healthy is a form of vandalism. It ought not to be done as though a small or preliminary undertaking. It too should wait for a final decision.

Both of these aspects of the so-called 'Early Works' will change the solemn, beautiful and time-honoured appearance of our War Memorial. I object to the planned redevelopment. The Memorial is a place to honour and commemorate those who have served our nation. It should not be expanded into a theme park of large, military equipment. It should retain its current character, which is such a respected part of our national culture and appropriate to our history.

Yours sincerely,

Professor Angela Woollacott FRHistS, FASSA, FAHA



Kenneth Heffernan From:

Thursday, 22 April 2021 1:55 PM Sent: Works Approval Consultation To: Cc:

Subject:

Comment by ACT Heritage Council on Early Works Approval Application for New ANZAC

Categories: Green category, Orange category

Dear Madam/Sir.

Thank you for the opportunity to provide email comment on the early works approval application for a new ANZAC Hall. I would like to take this opportunity to reiterate the Council's previous views on this development as provided in December 2019 to the Department of the Environment and Energy in relation to EPBC Act approval process:

[T]he new ANZAC Hall to the rear of the building is not supported by the Council, as it would have substantial heritage impacts. Firstly, the proposed demolition of the existing ANZAC Hall would diminish the heritage significance of the Memorial and its precinct. ANZAC Hall was completed in 2001 and in 2005 was awarded by a national awards' jury of the Australian Institute of Architects its Sir Zelman Cowan Award for Public Architecture. The building was praised for its sensitivity to the heritage and cultural values of the Sodersten and Crust designed Memorial.

Secondly, the proposed new ANZAC Hall is a visually intrusive structure which removes access to one entire side of the building and breaks the visual connection to Mount Ainslie. It requires the demolition of a number of other highly regarded previous extensions and structures and is over-large, overpowering the existing structure.

The Council considers in addition that the plans included to date do not provide information on the proposed use which would justify the size of the structure proposed.

In summary, while the proposed alterations to the building front and entry could be a positive step, the Council considers that the proposed rear extension would be detrimental to the heritage significance of the War Memorial and does not support it."

Thank you again for the opportunity to engage in your public consultation process,

Dr Ken Heffernan

From: Janet Perry

Sent: Thursday, 8 April 2021 9:56 AM
To: Works Approval Consultation

Subject: Stop the early works for the War Memorial redevelopment

Categories: Orange category, Green category

I am writing as a resident of Canberra to express my opposition to the early works proposed at the War Memorial.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the ancient eucalypts that surround the area should be prioritised.

I also believe the NCA should release a response to all submissions it receives on this issue.

Please consider seriously the sincere thoughts and feelings of the Canberra community

Kind regards Janet Perry

--

Sent from Gmail Mobile

From: Joyce and Malcolm

Sent: Sunday, 25 April 2021 5:27 PM
To: Works Approval Consultation

Subject: Submission for the War Memorial Project.

Categories: Green category, Orange category

To whom it may concern

I think this is a misguided project for some of the following reasons:-

- The demolition of Anzac Hall is inseparable from the project as a whole indeed the project depends upon it happening and it should be considered as part of the total package, not snuck through as an 'early work'.
- The Preliminary Arboriculture Assessment pdf shows the trees 'likely to be removed', most of them in 'good' or 'very good' condition. This is wanton vandalism on a scale which would change the look of the Memorial for decades to come. It cannot possibly be considered an 'early work'.

Trees are so important to our environment especially mature good conditioned trees.

Yours Sincere	ely		
Joyce Fraser	()

From: Peter Freeman

Sent: Thursday, 8 April 2021 10:15 AM
To: Works Approval Consultation

Subject: Stop the early works for the War Memorial redevelopment

Categories: Orange category, Green category

I am writing as a past-resident of Canberra to express my opposition to the early works proposed at the War Memorial.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the ancient eucalypts that surround the area should be prioritised.

I also believe the NCA should release a response to all submissions it receives on this issue.

with kind regards peter + tanny freeman

From: Dorin Suciu

Sent: Friday, 30 April 2021 9:37 PM
To: Works Approval Consultation

Subject: Australian War Memorial Upgrade

Categories: Green category, Orange category

Dear NCA,

I am appalled at the proposed spend on upgrading the Australian War Memorial. The figure of \$500 million is beyond belief especially when taking into account the Productivity Commission's Inquiry Report, "A Better Way to

Support Veterans" which clearly details how the lives of returned service men, women and their families can be improved. Nowhere in this Report does it mention that spending a huge sum of money on the existing War Memorial is

important for veteran's well being. In fact as a tax paying Australian citizen I would offer that upgrading the War Memorial does exactly the opposite - it is a vanity project the main purpose of which is to prop up the ego of one

particular Australian whose priorities for the veteran community do not align with the average person's and wastes money which should be spent on those seeking meaningful assistance - our returned service men and women.

Also, the ongoing investigation into alleged war crimes committed by Ben Roberts-Smith demonstrates extremely poor timing - there is no way such an excessive spend can be justified when there are so

many unanswered questions regarding the integrity of the high profile personalities linked to this project.

Going ahead with a multi-million dollar upgrade of the Australian War Memorial is not in Australia's best interests nor the interests of our war veterans.

Kind regards,

Dorin Suciu

From: Ivor Hind

Sent: Thursday, 29 April 2021 2:16 PM

To: Works Approval Consultation

Subject: Australian War Memorial

Categories: Green category, Orange category

To whom it may concern,

The proposed expansion and transformation of the Australian War Memorial into the Australian War Museum is a travesty. The war memorial is a place to reflect on war, and it's impact, and to commemorate those who died. Why change it into a place where one goes to view the military hardware that inflicted pain and death on those who defended our country?

This expansion will never end as new military hardware will replace the old.

The architecture of the war memorial is very special, and the proposed expansion will impact on the surrounding bushland (which adds to the sacredness of the space) and the opportunity for the indigenous Australians to reflect in the surrounding outdoor space.

Let the Australian War Memorial remain as a space to reflect and remember those who gave their lives.

It should not be used to glorify war and the weapons of destruction.

Regards Ivor Roy Hind

Ps. There is plenty of space in the regions where these items could be displayed such as the Aircraft Museum in Temora.

From:

Celine d'Orgeville Thursday, 8 April 2021 6:16 PM Sent: Works Approval Consultation To:

Cc: Celine Dorgeville

Subject: Stop the early works for the War Memorial redevelopment

Categories: Orange category, Green category

I am writing as a resident of Canberra to express my opposition to the early works proposed at the War Memorial.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the ancient eucalypts that surround the area should be prioritised.

I also believe the NCA should release a response to all submissions it receives on this issue.

Thank you, Celine Dorgeville

ACT

From:

Celine d'Orgeville Tuesday, 20 April 2021 4:35 PM Sent: Works Approval Consultation To:

Celine Dorgeville Cc:

Stop the early works for the War Memorial redevelopment Subject:

Categories: Green category, Orange category

I am writing as a resident of Canberra to express my opposition to the early works proposed at the War Memorial.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the eucalypts that surround the area should be prioritised.

I also believe the NCA should release a response to all submissions it receives on this issue.

The NCA is a beautiful museum that does not need to be improved, certainly not on the scale that is being considered here. It's fine as it is. Let's use this public money for some worthy project instead!

Regards,

Celine Dorgeville

From: Jane Styles

Sent: Thursday, 29 April 2021 3:11 PM
To: Works Approval Consultation
Subject: Early Works at Aust War Memorial

Categories: Green category, Orange category

To Whom it May Concern,

I am extremely concerned about the proposed 'early works' at the War Memorial. Once this extensive destruction of the site is approved, the rest will follow, with vast damage to the site, including the beautiful trees.

The disgraceful destruction of a recently built award-winning building will follow. All for the glorification of war weaponry.

I despair that so much tax payers' money is being allocated to convert the Memorial (to commemorate those lost in past wars) to a War Museum. My father served in WW2: I commemorate him and his mates, not their weapons.

The Mitchell site is where the expansion should take place to build a War Museum for any number of large and small items to be on permanent display. Weapons manufacturers can have their input there.

Hoping that peaceful empathy will prevail in this issue.

Jane Styles

From: john painter

Sent: Thursday, 29 April 2021 12:25 PM

To: Works Approval Consultation

Subject: The Australian War Memorial

Categories: Green category, Orange category

TO WHOM IT MAY, AND SHOULD, CONCERN

Under no circumstances do I believe the irrevocable "early works" proposal for the desecration of The Australian War Memorial (AWM) should be approved at this early stage. I cannot believe that the destruction of 160 historical trees that create the peaceful, truly Australian environment in which those thousands of Australians whose sacrifices are honoured, can be so insensitively destroyed until the proposed offensive plans are finally approved or hopefully rejected.

We already have the defacing of our National capital's entrance, Northbourne Avenue, through the destruction of 860 trees now replaced by small saplings struggling to survive in an ugly bushfire prone highway. While this is perhaps the responsibility of a different authority, surely the AWM is a part of our city and our nation - a nation that honours those thousands of our national community who have faithfully given their lives, often as the result of bad judgements by governments and their superior officers.

We should not be planning to create a memorial/museum to the past and present management of the AWM, rather we should be planning to continue to honour our past, present and future service men and women. Hopefully, every name to date is on the honour board. Every future name must also be there, no matter how many walls need to be constructed within the existing space and, until now, appropriate environment. These were and are human beings to whom we owe our lives. Airplanes, tanks and other killing machines, no matter how sentimentally important, belong in a museum, not in a sacred place created to honour the dead. We each have our own personal way of expressing our respect and gratitude - even with a candle and the odd bugle at the end of a driveway at dawn.

Additionally, it would be a thoughtless tragedy, not to mention a waste of money to bulldoze the award-winning Anzac Hall in order to make room for the worship of more killing machines.

Surely sense and sensitivity must prevail.

John Painter AM (Em Prof)

From:

Rachael Andrews Thursday, 8 April 2021 6:36 PM Sent: Works Approval Consultation To:

Stop the early works for the War Memorial redevelopment Subject:

Categories: Orange category, Green category

Dear NCA

I am writing as a resident of Canberra to express my opposition to the early works proposed at the War Memorial.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the ancient eucalypts that surround the area should be prioritised.

I also believe the NCA should release a response to all submissions it receives on this issue.

Further, I strongly oppose any further developments of the War Memorial. We need to channel any further funding into environmental protections where it is most needed.

Yours sincerely **Rachael Andrews**

Sent from my iPhone

From: John Widdup

Sent: Monday, 22 March 2021 5:41 PM
To: Works Approval Consultation

Cc:

Subject: Block 3 Section 39 Campbell, Australian War Memorial -- feedback on the application

Categories: Orange category, Green category

Hello,

This email in feedback on the proposal relating to Block 3 Section 39 Campbell, Australian War Memorial - https://www.nca.gov.au/consultation/block-3-section-39-campbell-australian-war-memorial.

The extent of works area does not encroach on any of the surrounding roads but the hoarding around the site of works shown it encroaching into Treloar Crescent near where buses currently park. And there are two vehicle entrance/exit gate at the same location.

Treloar Crescent and other roads around the works area are used frequently be people riding bikes.

It is important that the temporary traffic management arrangements on Treloar Crescent, and anywhere else where the road width is affected, adequately allow for the safe use of the road by people riding bikes. That includes adequate clearance between the hoarding and adjacent traffic lanes for the safe use by people riding bikes.

At the vehicle entrances and exits around the works area (lots of them shown on the drawings) it is important that there be adequate provisions to advise road users, including those riding bike, that vehicles are exiting (often hidden behind the hoardings) - probably by a traffic control marshal.

We would be appreciative of being able to review the Temporary Traffic Manage (TTM) plans before their approval.





Virus-free. www.avg.com

From: John P Warren

Sent: Friday, 30 April 2021 1:21 PM
To: Works Approval Consultation

Subject: AUSTRALIAN WAR MEMORIAL (AWM) EXPANSION: WORKS APPLICATION FOR

"EARLY WORKS": BLOCK 3 SECTION 39 CAMPBELL:

Importance: High

Categories: Green category, Orange category

I write in opposition to approval of the works application of 12 March 2021 "for early works associated with a redevelopment project at the Australian War Memorial".

- 2. The process here is all wrong. The actual project has not been precisely specified, yet various approvals have been sought which would make the project a *fait accompli*.
- 3. The original conception of the AWM was a place of national remembrance to commemorate those Australians killed in warfare. Canberra is supposed to be a symbol of Australian national life and values. The prominence of the AWM's position on one of the two principal land axes of Canberra's design was fully intended. By a process whereby a former Director got approval of his Board, chaired by a strong supporter of the military, and then locked in Government support for a \$498.7 million project, which the Opposition supported in order not to be politically wedged, the Australian public which is the principal stakeholder of the AWM has not been consulted on the basic concept. The result is that a treasured national monument could be turned into a military theme park to display large items of military equipment under the sponsorship of arms manufacturers.
- 4. It would surely be more consistent with the National Capital Plan for large items of military hardware to be located at Mitchell, rather than conflict with the remembrance functions of the AWM in Campbell!
- 5. There is considerable opposition, including from many significant people, around Australia and in Canberra to the ultimate proposal for the AWM! This has not been revealed by the survey that the AWM commissioned which had leading questions designed to elicit a favourable response.
- 6. I am a great-nephew of an Australian soldier who died on active service in Belgium in October 1917. I know the effect that his death had on my late grandmother, and his other siblings. It has been a comfort to be able to put a poppy against his name on the Roll of Honour on occasions such as Anzac Day. I have also been engaged with the history side of the AWM through deposition of copies of correspondence regarding my grandfather's service in the Boer War. I am a resident of Campbell.
- 7. The view towards the AWM along Anzac Parade will be diminished due to the large number of trees to be cut down around the Memorial. The Poppy's Café car park extension and temporary construction car parking has already led to a loss of amenity as a result of removal of the softening effect of large trees adjoining the main AWM building when viewed from Anzac Parade and Fairbairn Avenue.

- 8. The proposed \$498.7 million funding of the AWM extension is excessive by comparison with the financial squeeze on other national cultural bodies in Canberra, such as the National Archives of Australia, the National Gallery of Australia, National Library, etc., and funding of services to veterans with severe and urgent medical and psychological needs.
- 9. The over-development of the AWM's Campbell site puts an over-emphasis on the military in current Australian life. There has been an attempt to use for political purposes military service as a "sacred" element in secular Australia. Given the current security situation in the Asia-Pacific region, skilled diplomacy should be given prominence in the hope that peace can be maintained in Australia's region.
- 10. I therefore recommend that the works application for "early works" not be approved, and that instead the Australian public be given an early opportunity to express its view on the actual redevelopment proposal that the "early works" are supposed to lead to.

Yours sincerely,

(Dr. John P. WARREN)

From: Deborah Cleland

Sent: Friday, 9 April 2021 11:15 AM
To: Works Approval Consultation

Subject: Questioning the removal of trees for the proposed works at War Memorial

Categories: Orange category, Green category

Greetings,

As a lifelong Canberra resident and child of a veteran, I wish to communicate my concern about the removal of trees in the war memorial precinct.

The changes proposed at the war memorial have suffered from a gross lack of public consultation. There appears to be very little evidence there is a social license to expand at all, let alone with the destruction of further mature trees in Canberra's urban landscape, which hold heritage, Indigenous, biodiversity and habitat values.

I call upon the NCA in the strongest possible terms to acknowledge, publicise and release a response to the community responses it received on this matter.

Thank you for your consideration,

(Dr) Deborah Cleland.



I acknowledge the traditional owners and custodians of the land where I live and work, the Ngunnawal people as well as the Ngambri, Ngarigu, Yuin and others who traded on, travelled through and connected with this region, and continue to do so. I recognise all Custodians of Country throughout all lands, waters and territories. I pay my respects to the Elders past and present. Sovereignty was never ceded.

From: Bronwyn Griffith

Sent: Sunday, 18 April 2021 4:26 PM
To: Works Approval Consultation

Subject: Block 3 Section 39 Campbell Australian War Memorial

Categories: Orange category, Green category

To Whom It May Concern,

I am writing to comment on the pre works to be done at the War Memorial.

I have read the documents and acknowledge that the more recent wars need to be represented, that there should be improved access for disabled people and elderly veterans and that the circulation and flow around the building could be improved.

I am extremely disappointed that in order for all of these goals to be met, the landscape surrounding the buildings as they are now needs to be destroyed, especially for the Southern entrance and parade ground. The value of the existing trees to the site have been completely disregarded. There is not even a landscaping plan developed to restore the grounds once works is complete.

The War Memorial is amazing. It memorable because it tells the stories of those that fought and sacrificed for us but also has a presence and a feeling about it. The trees are part of the overall 'feel' and telling of those stories. The trees may not be labelled as heritage or have nesting birds in them but they are part of the place and have been there for a long time.

At every dawn service, you can hear the magpies, cockatoos and kookaburras through the silence. You can hear them because of the trees that are surrounding these buildings. They sit in them singing and are able to be part of ceremony. This will be lost with all those well established trees cut down for a building.

A large amount of space required to tell a story is unnecessary. I have visited the Sandakan memorial for Australian and New Zealanders near the base of Mt Kinabalu.

It consists of a small building where the stories are told and has three beautiful gardens around it......one for Australians, one for New Zealanders and one for the Bornean people who risks their lives to help the troops escape the Japanese on their death march. The gardens and 'feel' of the place move you to tears.

Why do the large vehicles of planes, helicopters and armoured vehicles need to be inside a gallery? Why can't they be incorporated into the existing grounds keeping the trees. Why can't the southern entrance be modified with a design that allows these trees to stay. Why can't a small amount of money be spent for a new lift so that the War memorial staff do not have to come down and operate the lift for them? Why can't a building be designed without tree removal from the Southern Entrance that can still make the memorial comply with the Disability Discrimination Act 1992 and improve the circulation and flow around the exhibits.

I acknowledge that veterans in the more recent wars need to be represented but there could be something said about spending so much money on a large space where these monies could be better distributed to helping returning veterans with their mental health. I am a firefighter and have been to a number of body retrieval's of veterans who have committed suicide.

The trees are very important to the site of the War Memorial and their presence in the 'feel' of the place has been extremely underestimated. It will be a tragedy to see them removed.

Regards Bronwyn Griffith Sent from my iPad

From: Helen Tan

Sent: Friday, 30 April 2021 4:53 PM
To: Works Approval Consultation

Subject: Block 3 Section 39 Campbell Australian War Memorial

Categories: Green category, Orange category

To whom it may concern:

Block 3 Section 39 Campbell Australian War Memorial

This is my submission in response to the proposal before you concerning the iconic, sacred and historic Australian War Memorial.

I do not need to add to the wise and professionally based commentary that has been provided by many illustrious and well qualified citizens of this country in speaking against this project. I add my voice as a mere taxpayer and citizen, as the daughter of WWII veterans (both my parents served in the Allied Cause) and as a granddaughter of a WWI veteran (British Army). In doing so I hope to add support for those who have written, spoken, and submitted against this project with reference to their professional and academic disciplines. There have been innumerable such voices since this proposal was first mooted.

This is a heritage site with historic and sacred significance. As such, any demolition and/or expansion, development, or redevelopment should only be undertaken for the most compelling of reasons, perhaps to do with the safety or preservation of the site or its existing structures. Just wanting more exhibition space, or desiring to expand it in the character of a museum, is not a sufficient reason as there is plenty of possibility in the territory for off site display space and museum like facilities.

To proceed as proposed constitutes vandalism and desecration of the worst order. It is entirely gratuitous.

To remove significant, beautiful and historic trees in the cause of ever more built environment on this beautiful site, selected so long ago to honour the terrible suffering of a nation, is vandalism.

I object to the proposal and I especially object to the proposed destruction of the trees to enable it. I have enjoyed seeing these trees since I was 16, so for 52 years. Each one represents several lifetimes in a country very thin on culture and care of the natural environment on the part of its post 1788 settlers. This proposal epitomises that readiness to destroy and vandalise that has been characteristic of the past 250 years. Why can't we control this impulse?

If the NCA can do no better than rubber stamp such an obviously venal affront to this site, if it can do no better than wave through the vandalistic desires of its political masters, it might as well not exist, and will go down in infamy on account of it.

Dr Bean is not here to speak in defence of his legacy. We must speak for him. I'm sure many citizens will do so.

Helen Tan

Sent from my iPad

From: Lynne Bentley

Sent: Friday, 30 April 2021 12:31 PM
To: Works Approval Consultation

Subject: Proposed redevelopment of the Australian War Memorial

Categories: Green category, Orange category

Dear National Capital Authority

I am writing to you to beg you to stop commencement of the early works proposed for the Australian War Memorial. Because as sure as night follows day, the early works will never be reversed, holes won't be filled in, Anzac Hall never rebuilt, and trees never put back on their stumps. The early works will guarantee that the redevelopment proposed for our iconic Australian War Memorial will go ahead and the purpose and appearance of the Memorial will be changed forever.

The proposed redevelopment with its two separate entrances, with the museum entrance more easily reached than the Memorial entrance, will guarantee some people will bring their children just to entertain them with planes, guns, tanks etc, no doubt some Questacon-like interactive displays, and maybe some of the weapons able to be climbed on and into, without them ever having to enter the Remembrance area above.

The Australian War Memorial belongs to the people of Australia. Have they any idea what is about to happen to this most important of Australian buildings?

Please do not go ahead with the proposed early works, which will irrevocably lead on to proposed redevelopment, until the People of Australia have been made fully aware of the proposed changes and have been able to have their say.

Your sincerely

Lynne Bentley

From: elizabeth healey

Tuesday, 4 May 2021 11:16 AM
Works Approval Consultation

Subject: Objection to Proposed \$500m expansion of Australian War Memorial

Categories: Green category

Dear NCA

I am writing to object to the proposed "early works" that are being considered by you to demolish the Anzac Hall, remove over 100 mature eucalypts in the Memorial Grounds, and the extensive excavation works near the Memorial entrance of the Australian War Memorial.

Members of our family, like many other Australians, have served in World Wars 1 and 2, and more recently in Timor and Afghanistan. Some of these members of the Armed Forces have memorial plaques at the War Memorial as a solemn remembrance of their sacrifice.

I plead with you that the proposed "early works" alterations should not be allowed to proceed until the project as a whole has been considered. The estimated cost of \$500m should not be wasted on these works.

I believe that the Australian War Memorial, which we have visited on many occasions, should remain a solemn and eternal reflection of our men and women who have served in these conflicts. It should not be turned into a "Theme Park" entertainment precinct.

This amount of money could be better spent on helping the health of our servicemen and women who are experiencing post-traumatic stress, which we have first hand experience of this illness. The suicide rate in members of the Armed Forces past and present is a national disgrace.

The NCA should give serious consideration to deferring these "early works" until it has received a Works Approval application from the Memorial for the rest of the project. It could then consider all components of the project as a single package.

Thanking you for your consideration of my points in this matter.

Yours sincerely

Elizabeth Healey

From:

Max Bourke Tuesday, 23 March 2021 1:59 PM Sent: To: Works Approval Consultation

Cc:

Subject: Demolition of trees around the AWM

Categories: Orange category, Green category

The NCA might have to consider this proposal but the AWM should be ashamed of itselft for even considering these works. At a time now more acute than ever where we need to protect and enhance large trees if we are to survive on this planet this bunch of vandals is leading the charge. Shame on them and reject!

Max Bourke AM

From: Margaret Lee

Sent: Friday, 30 April 2021 4:04 PM
To: Works Approval Consultation
Subject: Desecration of the AWM

Categories: Green category, Orange category

I wish to protest at the desecration of the Australian War Memorial, which was constructed as a place of reflection on the outcomes of war. It was not designed to be a showcase for the every-growing list of weapons of mass and personal destruction. It seems that the makers of weaponry have found a fellow-traveller within the structure of the Memorial, and have been able to persuade him/her/them that it should be a museum of weaponry rather than the reflective space it was meant to be.

I think it is unconscionable that so much money should be spent on this exercise while the victims of our various ventures suffer from mental disorders brought on by their service, with little help to recover. This half-million would put quite a dint in the amount needed to treat the afflicted.

In addition, at a time when we are suffering from a steadily warming planet, when every tree makes a difference, this exercise would see the removal of 100 trees with historic connections to the building. These two reasons alone are sufficient to indicate this is an unworthy project.

I urge you to refuse the approval of 'early works', so that the final project can be given proper consideration. If the early works are carried out, it seems to me that the mess that will be created will ensure the final project will go ahead. This should not be allowed.

Finally, I urge you to consult the wounded and damaged service people who are struggling to get the help they need to see if they are happy to forego their treatment in order for this to procede.

Margaret Lee

From: Julie Deaves

Sent: Thursday, 8 April 2021 10:34 PM
To: Works Approval Consultation

Subject: Stop the early works for the War Memorial redevelopment

Categories: Orange category, Green category

I am writing as a resident of Canberra to express my opposition to the early works proposed at the War Memorial.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the ancient eucalypts that surround the area should be prioritised.

I also believe the NCA should release a response to all submissions it receives on this issue.

Regards

Julie Deaves

1

From: Claire Cruickshank

Sent: Friday, 30 April 2021 3:10 PM
To: Works Approval Consultation

Subject: Submission to War Memorial's 'early works'

Categories: Green category, Orange category

As a resident of Canberra of twenty years and a former staff member of the AWM, I am writing to lodge a submission to the NCA to vehemently express my opposition to the 'early works' proposed at the War Memorial on the following grounds:

Public space and community amenity:

The so-called 'early works' will drastically and irrevocably change the appearance and character of the Memorial's grounds to the detriment of the public space and amenity. Anzac Hall is a prize-winning building which sits in the landscape inconspicuously. Its proposed replacement and new front entrance will not. It will massively alter the appearance of the parade ground and main entrance and the 'early works' to facilitate this should be immediately stopped.

Environment heritage or landscape values:

The 'so-called 'early works' requiring the destruction of the 116 mature trees is an outrageous act of environmental vandalism in direct contravention of the National Capital Plan which protects the bush capital's arboreal character. This vandalism is particularly egregious in a time of pressing climate crisis when tree cover is vital to counteract urban heat island effect. The preservation of the eucalypts that surround the area should be prioritised.

Secondly, the proposed works contravene all the AWM's longstanding own heritage plans as well as the advice of the Australian government's own heritage experts and the Australian Heritage Council. These 'early works' are not that but an integral part of the whole project and if allowed to proceed will irrevocably destroy the character of this central institution and despoil Burley Griffin's vision for the capital.

I also wish to demand that any further redevelopment must involve **genuine and accountable** community consultation, including releasing all submissions the NCA receives on this issue and its response thereto.

To that end I give permission for my submission to be made public.

Sincerely Claire Cruickshank From: Jill Lyall

Sent: Friday, 23 April 2021 1:30 PM
To: Works Approval Consultation

Cc: Tim Hollo

Subject: Redevelopment of Australian War Memorial

Categories: Green category, Orange category

Dear NCA

We are writing to express our concern about the redevelopment of the War Memorial. The massive circus proposed goes against the original values and intent of this important monument. Firstly the scale is far too large and appears to value war and warmongering and the associated war technology rather than serve as a reminder of the terrible loss and grief inflicted by war. We protest strongly against the destruction of more elegant heritage building it is proposed to replace.

Secondly the funding is coming at least partly from military hardware and software corporations which is inappropriate and even corrupt. Australians do not value war of itself. And we have been pulled into far too many needless wars in recent decades.

Thirdly you are proposing to destroy an avenue of majestic heritage trees in order to erect this monstrosity.

The so-called consultation was a poorly constructed survey with leading questions and questionable assumptions and we do not believe that most Australians would agree with the reality of this redevelopment. We urge you to go back and consult properly with the community.

Yours sincerely

Jill Lyall and James McDonald

Get Outlook for Android

From: Helen Stevens

Sent: Thursday, 22 April 2021 4:23 PM
To: Works Approval Consultation
Subject: War Memorial Expansion

Categories: Green category, Orange category

I am not in favour of the current proposed development at the site of the Australian War Memorial.

- 1. It is a 'memorial' not a museum. Already this aspect has been blunted. By expanding we are detracting from the site as a memorial and diminishing the presence of the original building with its iconic pool of reflection precinct. You are reminded of the sacrifice by so many people as you enter up the main stairs to see this precinct in front of you.
- 2. A development elsewhere to allow future expansions would be a better. Necessarily any building on the current site will be limited. Sadly, into the future there will be more conflicts needing acknowledgement by displaying artefacts and space will be required.
- 3. A building and site should be specifically chosen with future expansion in mind as well as plan for parking and public transport.
- 4. A specially chosen site could be landscaped with tree cover, increasing the value to the environment unlike the current plan where many trees are to be removed.
- 5. There would be a negative impact on the surrounding area:
 - a) Traffic and noise near a school and residential area.
 - b) Limestone Ave is already a very busy road.
 - c) Unsightly works during construction for visitors.
- 6. It is not appropriate to spend such a large sum when Veterans are obviously needing a great deal more support from Government following the impact on their health from their service. This money should be redirected no matter from what budget area.

The museum needs for the distant future, sanctity of the current site, the physical support of the Veteran community should come before any expansion in Campbell is undertaken.

With respect

Helen Stevens

__

Sent from Gmail Mobile



Submission to National Capital Authority

Block 3 Section 39 Campbell – Australian War Memorial

Author: David Stephens for Heritage Guardians 30 April 2021

Contents

Introduction3
Works application approvals and the role of the National Capital Authority4
What the early works application covers and why it should not be dealt with in isolation from the main works applications
We are being played for mugs by this cynical abuse of process6
The early works application cannot be assessed in isolation from the prospective main works applications7
The National Capital Authority's 2019 decision on the early works application for carparking at the Memorial is not a precedent: these early works are on the same ground as the main works they relate to
Why the Memorial is doing it this way: 'salami slicing' or progressive approvals creating inevitability10
Two scenarios
The National Capital Authority's claim that a decision on one approval does not affect its decision on a future related approval is simply implausible11
It is difficult to compare the early works approval application with the relevant National Capital Authority documentation
The Memorial and the Authority are not even on the same page12
Planning Principles and Precinct Codes
Given that this may be the last chance for meaningful public input, it is important at this stage to summarise arguments against the prospective main works applications, covering the whole project
Public space and community amenity
Environment, heritage or landscape values
Amenity of the locality in terms of materials, finishes, scale, massing, design and quality $\dots 18$
Consistency with an existing Heritage Management Plan19
Conclusion
Appendix 1: Some problems with the National Capital Authority consultation process and documentation
Appendix 2: The Memorial is not taking the National Capital Authority consultation seriously: it has regarded the project as a 'done deal' since November 2018

Introduction

- 1. It is important that this 'early works' approval (EWA) application to the National Capital Authority (NCA) be vigorously opposed. It includes the demolition of Anzac Hall, one of the most controversial aspects of the whole Memorial project. It also provides for the removal of most of the mature eucalyptus trees in the grounds of the Memorial, including all the trees in front of the main building and flanking the Parade Ground. Finally, the application calls for 'bulk excavation' of a large area around the entrance of the Memorial. This will facilitate demolition of the Parade Ground and construction of a new underground entrance.
- 2. Heritage Guardians (HG) is a small committee set up to manage a community campaign against the Australian War Memorial project. This submission is written on behalf of the hundreds of people who have supported the HG campaign over the last two years.
- 3. HG note that decisions have been made:
 - by the Parliament, responding to a report of the Joint Parliamentary Standing
 Committee on Public Works (PWC)
 - by the Minister for the Environment under the heritage provisions of the Environment Protection and Biodiversity Conservation (EPBC) Act.
- 4. Despite the remarks by the NCA (on <u>its website page relating to this consultation, hereafter called 'the NCA consultation page')</u> about the above decisions, HG does not accept that the last word has been said on the need for the project or on its heritage aspects. Some of these matters are aired again in this submission.
- 5. Since March 2019, the HG campaign diary has tracked the history of the campaign against the War Memorial project. References for most of the statements in this submission can be found in that campaign diary or in the links hanging from it.
- 6. While the submission is wide-ranging it does not get into every one of this complex set of issues, including whether the Memorial should have pursued other development options (better use of its campus at Mitchell, repurposing parts of the Campbell site, digitisation), let alone whether it has done these things vigorously enough to satisfy the terms of section 341ZC of the EPBC Act, which refers to minimising adverse impacts on heritage values. Other submissions may well cover these matters.
- 7. Nor does the submission get into the masses of spurious 'survey' material the Memorial has used since 2018 to justify its claims of wide support for the project. This material has been

characterised by leading questions, biased samples, low response rates, and misleading spruiking by public officials and contractors who should know better. The words 'mendacious' and 'meretricious' are appropriate for much of this 'evidence'.

8. **Appendix 1** of the submission addresses what HG sees as serious problems in the NCA consultation process – and ones that need to be rectified before the Authority considers any main works approvals (MWA) applications from the Memorial. **Appendix 2** offers evidence that the War Memorial is taking the NCA part of the approval process less than seriously. The submission proper, however, relates directly to the consultation closing on 30 April.

Works application approvals and the role of the National Capital Authority

- 9. Works application approval is the responsibility of the NCA. 'Works' is defined in the *Australian Capital Territory (Planning and Land Management Act 1988* (the PALM Act) and the National Capital Plan (NCP) to include the construction, alteration, extension or demolition of buildings or structures, landscaping, tree felling or excavation, but to exclude anything done inside buildings or structures. The NCA has advised HG that there is no formal definition of 'early works', but that the term generally refers to preparatory works in advance of major construction activities. Typically, the Authority says, this may or may not be limited to site establishment, excavation, demolition of structures, services relocation, tree removal and temporary structures.²
- 10. That lack of formal definition certainly leaves the Authority with room to manoeuvre. A definition of 'major works' is also difficult to pin down. According to page 82 of the NCP, 'The determination of those applications that constitute major works is at the discretion of the National Capital Authority'. Dealing with works applications major or not, there are 300 to 400 of them annually has been delegated to the Authority's Chief Planner and his staff, beneath the oversight of the Board of the Authority.³
- 11. The NCP contains broad planning principles and policies for Canberra and the Territory, as well as detailed conditions of planning, design and development for 'Designated Areas', which include the Constitution Avenue and Anzac Parade Precinct. 'The NCA will make an assessment of whether a proposal is consistent with the National Capital Plan', says the Authority's Commitment to Community Engagement at section 2.7 'Works Applications'.

12. Section 2.7 goes on:

An assessment will be made in relation to adverse impacts on:

- public space and community amenity
- environment, heritage or landscape values
- amenity of the locality in terms of materials, finishes, scale, massing, design and quality
- consistency with an existing Heritage Management Plan.

This submission will come back to those key words.

What the early works application covers and why it should not be dealt with in isolation from the main works applications

- 13. 'The Early Works Packages within this WA [works application]', according to the pdf *Planning Report* by the Memorial's consultants, Knight Frank (attached to the NCA consultation page), 'are to adequately prepare the three works sites of the New Southern Entrance, Anzac Hall and Glazed Link and Bean Building Extension and Central Energy Plant for construction' (*Planning Report*, page 17). That fits with the NCA's loose definition of 'early works' referred to above (para 9).
- 14. This match-up is not unexpected as, according to both the Authority and the Memorial, the two sides discussed the EWA before it was lodged. The Memorial admitted to HG that it was the Memorial's idea to run up Anzac Hall demolition, massive excavation, and tree-felling as 'early works'. Neither the Memorial nor the Authority, however, would tell HG whether the Authority agreed to this course of action by the Memorial.⁴
- 15. There are four Early Works Packages within the application, as set out in the Knight Frank *Planning Report* (page 5):

EWP1	Early Works Package 1	Project Perimeter Hoardings
EWP2	Early Works Package 2	Services Relocation and Ancillary Works
EWP3	Early Works Package 3	Demolition of Anzac Hall
EWP4	Early Works Package 4	Civil Works and Bulk Excavation

We are being played for mugs by this cynical abuse of process

- 16. What lies beneath that bland Knight Frank statement in para 13 above ('adequately prepare'), on behalf of its client the War Memorial, becomes glaringly obvious in the list of works covered by the EW 'Packages' (*Planning Report*, page 6). We have added emphasis to the important items in case the reader misses them.
 - Installation of project perimeter hoardings
 - Services capping and relocations
 - New timber workshop entry door and path into the existing Bean Building
 - Demolition of Anzac Hall
 - New roundabout to Poppy's Carpark entry road
 - Civil works, earth retention systems and **bulk excavation**.
- 17. The incongruity of the bolded items in that list is obvious: the destruction of an award-winning building less than 20 years old, and costing \$20m in today's dollars, is set alongside the erection of a fence; the excavation of hundreds of square metres of historic earth on the southern side of the Memorial is mentioned in the same breath as knocking up a new door and pathway.
- 18. The NCA and Canberrans and Australians are played for mugs by documentation like this. It is a cynical abuse of process to bundle fundamental aspects of a project works without the completion of which the project could not proceed with minor site preparation. This is no more than a rort to seek approval for irreversible works which will inevitably lead to massive permanent changes to the Memorial at the same time as getting a tick for temporary modifications to improve access for or protect the safety of construction workers.
- 19. And the 'early work' of destroying at least 116 trees is not even listed above but first appears (on page 23 of the Knight Frank *Planning Report* document) as one of nine items in EWP4, and scattered entries after that. Played for mugs, again. (The pdf *Preliminary Arboriculture Assessment* attached to the NCA consultation page supports the number of 116 and perhaps more.)
- 20. 'The Early Works will be undertaken to enable the major new build elements of the Development Project defined as the following Main Works Packages', Knight Frank reminds us on page 5 of the *Planning Report*. These 'Packages' are listed in the *Planning Report* as below (page 6):

MWP1	Main Works Package 1	Southern Entrance and Main Building (Civil and Structural Works for Main Building only)
MWP2	Main Works Package 2	Bean Building Extension and Central Energy Plant
MWP3	Main Works Package 3	Anzac Hall and Glazed Link
MWP4	Main Works Package 4	Main Building Refurbishment other than MWP1 works

- 21. The Memorial's Executive Director Development <u>told Senate Estimates recently</u> that the 'Packages' would be dealt with by the NCA in June-August, except for matters covered by MWP4, which will not be progressed until 2022. (The Memorial's Director a different officer seemed not to be aware at Estimates that there were further applications to come to the NCA after the early works application. See **Appendix 2** to this submission.)
- 22. Comparison between the two tables above reveals the integral relationship between the key early works and the main works. While glitches with EWP1 Project Perimeter Hoardings and EWP2 Services Relocation and Ancillary Works might lead to OH&S problems or inconvenience, a failure to demolish Anzac Hall under EWP3 or perform the bulk excavation under EWP4 would be catastrophic to the whole project. It would stop in its tracks; MWP1 and MWP3 could not happen. EWP3 and EWP4 are not 'site preparation'; they include essential works.
- 23. Further, MWP1, 2 and 3 all depend on the destruction of those 116 or more trees around the front of the building, to the east of the Bean Building and behind Anzac Hall. Again, the tree-felling is not site preparation but essential work, intricately connected to the future construction.

The early works application cannot be assessed in isolation from the prospective main works applications

24. The demolition of Anzac Hall, one of the most controversial aspects of the whole project, is inseparable from the rest of the project as a whole – the project depends upon it happening – and it should be considered as part of the total project, not sneaked through as an 'early work'.

To go back to the language of the Knight Frank *Planning Report*, each EWP should be considered simultaneously with its associated MWP.

- 25. The destruction of at least 116 trees, some of them older than the Memorial itself, is wanton vandalism on a scale which would change the look of the Memorial for decades to come. It will destroy the essential link between the Memorial grounds and Mount Ainslie. Any replacement trees will despite the architect's fanciful illustrations in the Memorial's final preliminary documentation take decades to reach the size and grandeur of the destroyed trees. The tree-felling cannot possibly be considered an 'early work'. It is a fundamental and integral part of the project.
- 26. The proposed 'early works' also include the massive excavation south of the existing Southern Entrance and across the Parade Ground. The map at page 7 of the pdf Southern Entrance attached to the NCA consultation page reveals the extent of this excavation (within the dotted blue line). An excavation of this magnitude cannot possibly be considered an 'early work'. Again, it is an essential element of the project, without which key main works could not happen.
- 27. If we were looking at a 'greenfields' site, a bare paddock with a few trees, and, even, say, a derelict shearing shed, it might make sense to describe as 'early works' digging a great big hole, chopping down the trees, and bulldozing the shed. That might have been a rough description of the Memorial site in the 1930s when building commenced, but it is not at all a description of what we have now. The NCA should start from this point: the characteristics of the Memorial site in 2021 a heritage building in a memorable landscape.

The National Capital Authority's 2019 decision on the early works application for carparking at the Memorial is not a precedent: these early works are on the same ground as the main works they relate to

28. When the NCA recently provided HG with examples of its previous consideration of early works it mentioned projects in Constitution Avenue and at the Australian National University but, curiously, not the Authority's consideration of the building of new carparking at the Memorial.⁵ That consultation was in 2019 and the consultation report is readily available on the NCA website. That works approval application was for the extension of Poppy's Café Carpark at the Memorial and the installation of a temporary carpark nearby for use by workmen. The Authority decided as follows: 'The proposal is not inconsistent with the provisions of the National Capital Plan, and is supported'.

- 29. The Memorial carparking application and the NCA decision is clearly relevant to the current application (because the carparking was at the Memorial) but it is by no means a precedent. While nowhere in its carparking report does the Authority use the term 'early works', that is clearly what the carparking was early works for the big \$498m project. 'This Works Approval is the first of the permanent works forming part of the broader redevelopment project', according to the NCA consultation page on the carparking. That sounds like an 'early work', even for an Authority that likes its definitions vague (see para 9 above), but let's leave that aside for now.
- 30. When 18 of 22 submitters to the carparking consultation complained that the approval for the carparking work had been considered separately from the overall Memorial redevelopment proposal, the Authority responded to the objections thus:

The extension of the carpark is an independent structure [in a couple of renderings, "a standalone project"], not physically connected to the larger redevelopment project and is therefore able to be considered as a separate project. The extension of the carpark does not prejudice the NCA's consideration of future works approvals associated with the redevelopment of the AWM.

- 31. As was pointed out on Honest History at the time, the Authority's language was clumsy but its intention was clear: the carparking work was only metres from the Bean Building, a building to be extended as part of the big project, but that short distance was enough to make it a separate project. (Even though it was also 'the first of the permanent works forming part of the broader redevelopment project'!)
- 32. What is happening now, in 2021? Does the 'separate project' precedent help the Authority this time, even if we avoid the question of whether the carparking was an 'early work'?
 - The old Anzac Hall has to be demolished to enable the construction of a new, two
 level Anzac Hall, a central component of the whole project, not just 'physically
 connected to the larger redevelopment project' but to be built on virtually the same
 footprint as the old Anzac Hall (Main Works Package 3).
 - The huge excavation to the south of the Memorial is not just 'physically connected to the larger redevelopment project' but is essential to allow construction of a new entrance and reconstruction of the Parade Ground, both key components of the project, and both within the space covered by the excavation (Main Works Package 1).

• The removal of at least 116 trees is essential to allow construction of the new entrance and reconstruction of the Parade Ground, extension of the Bean Building, and construction of the new Anzac Hall, in each case not just 'physically connected to the larger redevelopment project', but three areas of the Memorial grounds currently graced by those trees (Main Works Packages 1, 2 and 3).

To sum up, the carparking 'separate project' precedent does not apply to these three 'early works'.

Why the Memorial is doing it this way: 'salami slicing' or progressive approvals creating inevitability

33. The Memorial is encouraging the NCA to indulge in 'salami slicing', a rorting or gaming of an approvals process, where the approving authority progressively approves works of such importance and so inter-connected that it will be impossible not to approve the whole project when applications for further components are made. Indeed, the approvals in such cases make no sense unless it is assumed that later approvals will follow.

Two scenarios

- 34. Absent any further approvals, the carparking referred to above would be capable of standing alone, but that is clearly not the case with the demolition of Anzac Hall, the destruction of the 116 trees, and the massive southern excavation. If the Authority were to give *no further approvals* but work had already proceeded on the basis of the early works approval, Canberra and Australia would be left with the original Memorial, except for a big Anzac Hall-shaped hole at the rear already dug or being dug, all those trees gone or being chopped down, and a huge hole dug or being dug at the south of the building.
- 35. If, on the other hand, *no further approvals* were to be given by the NCA and work *had not* already proceeded on the basis of the early works approvals, the proponent, the War Memorial, would be loud in its protestations: 'How can you possibly not give us approval to build a new Anzac Hall, when you have approved the demolition of the old one?' 'How can you possibly not give us approval to build stuff out the front when you have put a tick on digging a great big hole to build the new stuff in?' 'How you can possibly not approve these new constructions when you have approved our chopping down all those trees that stand in the way?'
- 36. Above all in the second case, the Memorial would say, 'The prime minister said we had the money!' and 'The prime minister unveiled the plans!' It would also point to the Parliament's

decision in response to the PWC report and to the Minister's decision under the EPBC Act (see above para 3). The political pressures on the NCA are enormous. Yet, it still has a role to play.

- 37. In playing that role, the NCA should recognise that these so-called early works the demolition, the big excavation, the mass tree-felling are irreversible and fundamental and should not be dealt with in isolation from what is meant to happen in the future. Approval of these early works makes further consultation irrelevant and redundant.
- 38. Apart from anything else, why would people bother to provide their views on the new Anzac Hall, the new Southern Entrance and Parade Ground, and the new Bean Building, when the die had been cast by the early works approvals? The NCA's commitment to community engagement would look hollow indeed.
- 39. Which of the above two scenarios is more likely is unclear. The Memorial Director's delphic remarks to Senate Estimates about 'construction related activity' do not help (see **Appendix 2** to this submission).

The National Capital Authority's claim that a decision on one approval does not affect its decision on a future related approval is simply implausible

- 40. 'The extension of the carpark does not prejudice the NCA's consideration of future works approvals associated with the redevelopment of the AWM.' That was the Memorial's caveat in the carparking case referred to above (paras 28-32). The fig leaf of physical separation between the carpark and the rest of the Memorial makes that claim in that case moderately plausible. Were the Authority to make *no more decisions* approving aspects of the redevelopment, the Memorial would have at least gained a nice new carpark. But we are now in different territory: the early works approval and the potential future approvals are intricately connected; there is no physical separation between the key elements of the EWA and the key elements of the project proper.
- 41. 'The NCA', the Authority reminds submitters on this occasion, 'has previously approved a number of earlier projects and preparatory works as part of the AWM redevelopment. These include new car parking, asbestos removal and temporary structures currently used for display, office purposes or site compounds.' These items were regarded as so minor, apart from the carparking, that they did not require public consultation. Surely, the Authority's previously waving through the carparking application made it easier for it to put a tick on all those other small salami slices? Can we really believe the Authority when it claims as it probably will

again this time around – that its current deliberations will not be influenced by these earlier ones?

42. This is especially the case when, as noted above (para 14), the Authority and the Memorial discussed tactics, and the Authority has been represented on the relevant IDC since 2018.⁶ And by its Chief Planner at that, the role of whose Planning and Design staff includes assessing works approval applications (at the rate of 300 to 400 a year).

Works approval functions have been delegated to the Chief Planner and his staff [the Authority's Chief Executive told HG on 10 March 2021]. As you would appreciate, while the powers may be delegated, the accountability lies with the Authority. Wearing my hat as Board member I know the Authority will wish to know the matter has been assessed against, and is consistent with, provisions in the National Capital Plan (the Plan).⁷

43. None of this work – and none of the NCA approvals where they have applied or will apply – makes any sense unless it is assumed that the big project will go ahead. The NCA should halt the salami slicing and defer consideration of these massively important so-called 'early works' (and the hoardings, paths, gateways and other relative trivia caught up in the application) till the relevant main works applications come forward.

It is difficult to compare the early works approval application with the relevant National Capital Authority documentation

44. Having said all of the above, this submission now tries to look at the current application in its own terms, testing or comparing it against the NCP. This is exactly what the NCA claims it has to do. The comparison task is not easy, however. The application was so obscure about which NCP provisions were relevant that HG had to seek further advice from the NCA while the consultation clock ticked on.

The Memorial and the Authority are not even on the same page

45. The NCA consultation page says:

The NCA will assess this works approval application and determine the consistency of the works against the National Capital Plan (the Plan). The Plan focuses on planning matters and quality of design. (emphasis added)

46. By contrast, the Knight Frank *Planning Report*, the key document in the application on behalf of the Memorial, says:

[G]uidelines in the National Capital Plan (NCP) do not relate to the works proposed under this application. This application describes the works and provides background information for the overall development project. (page 6; emphasis added)

[T]he proposal [that is, the big project] is assessable against the NCP. The works proposed [in the EWA, on the other hand,] are limited to early works packages of site hoarding, services relocations and ancillary works, demolition and excavation. Guidelines within the Plan are developed to control the design outcomes of built form. As a result, specific guidelines of the Plan do not relate to the works proposed and are therefore not addressed in this planning report. (page 28; emphasis added)

This report has not addressed Detailed Conditions of Planning, Design and Development within the NCP because **the works proposed are not of a nature which may be assessed against design-based guidelines**. (page 36; emphasis added)

Despite all the above, however, '[t]his report has been provided in compliance with **NCA** requirements for demolition and excavation works applications ...' (Knight Frank, page 6; emphasis added)

47. Prima facie, on this evidence, Knight Frank (for the Memorial) and the NCA are not even on the same page: Knight Frank is saying its early works application on behalf of the Memorial has nothing to do with what the Authority is supposed to be assessing, compliance with the NCP. On the other hand, the EWA is 'in compliance with NCA requirements for demolition and excavation works applications', whatever they are.

Planning Principles and Precinct Codes

48. HG asked the NCA what Knight Frank meant by 'NCA requirements' as above, and where these could be found. The NCA referred HG to the definition of 'works' under the PALM Act and added:

Works are assessed by the NCA for consistency against the National Capital Plan. The National Capital Plan sets out planning and design requirements; and works, including demolition and excavation, are considered under **the Planning Principles and Precinct Code provisions of the National Capital Plan**. (emphasis added)⁹

49. HG is puzzled as to why this useful information could not have been included on <u>the NCA</u> <u>consultation page</u> as an aid to people providing submissions. As it is, the consultation page

calls for 'relevant' submissions but provides minimal criteria for relevance beyond the bare reference to the National Capital Plan. It virtually sets up the process to generate a number of submissions which the Authority can regard as not relevant and thus can easily dismiss. Moreover, the supporting pdf documents are bundled together in a confusing way, with no guide or simple explanation as to which is which, and no clear linkage to the key Knight Frank *Planning Report*.

- 50. HG is puzzled also by the vagueness of the Knight Frank reference ('NCA requirements for demolition and excavation works applications'). Did Knight Frank or the Memorial even look at the Planning Principles and Precinct Codes? Why did they not make more of an effort to match their material against these documents? Perhaps because there is virtually no mention in either the Planning Principles and Precinct Codes of demolition, excavation, or tree-felling, except in the definition of 'Works' right at the end of the NCP.
- 51. The Planning Principles cover a wide range of matters but only small parts of them are relevant to the EWA. Under Principles 2.4 'Liveability', there is this: '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'. One would have thought that was something that the Memorial and its consultants could have written eloquently about, even when talking about early works. But there is nothing on this in the crucial Knight Frank *Planning Report*.
- 52. The pdf *Heritage Impact Statement* provided with the EWA has one mention (page 14) of the demolition of Anzac Hall ('This is a significant negative impact and the most detrimental aspect of the proposal') but not a word about the NCP. The pdf *Ecological Impact Assessment* provided with the EWA has lots of references to individual trees but none to chopping lots of them down and its only reference to the NCP reminds us that the Plan includes Designated Areas.
- 53. Then, further down on the same page of the Planning Principles under 'Liveability', we find, 'Vistas to major landscape features must be protected from and enhanced by development'. The only mentions of Vistas in the EW documentation are a single, solitary note in the 61-page *Heritage Impact Statement* and four passing references in the *Planning Report* (none of them anything to do with demolition, excavation or tree-felling, the key elements of the EWA). Amid the bundle of plans in the <u>pdf Southern Entrance</u>, there is *not one* reference

- to Vistas, even though that great big hole is being dug at one end of the famous Parliament House Vista.
- 54. Even further down on the same Principles page, the NCA may require Heritage Management Plans (HMP) and Heritage Impact Statements (HIS) to accompany applications. As noted above, the EW documentation includes an HIS, but the HMP is still pending, the 2019 draft having been withdrawn so it can be reworked to fit the reality of a destroyed Anzac Hall. The 2019 draft and its 2011 predecessor both assumed Anzac Hall would remain. There is more on this further down in this submission (paras 77-81).
- 55. It is a pity the NCA Principles only say the Authority 'may' require an HMP. That is not a very high bar for the Memorial to clamber over. On the other hand, the relevant Principle goes on to say, 'Development should be consistent with the requirements of any relevant Heritage (or Conservation) Management Plan for that particular place'. It is only a 'should', but one would have thought parking an inconvenient HMP for years till the development caught up with it is against at least the spirit of the EPBC Act. Or it ought to be.
- 56. Similarly, the NCA's Precinct Code 4.8 'Constitution Avenue and Anzac Parade' is comprehensive but its relevance to the early works demolition of Anzac Hall, big hole, tree-felling is limited. Under Objective 4.8.3 we find '7. Develop a built environment which demonstrates design excellence'. You would think that was a free kick for Knight Frank and the Memorial, with all those design-focussed architects lined up to do the work. But again, there is no mention in the EW documentation; Knight Frank, on behalf of the Memorial, made it clear it would avoid the subject of design (see above paras 45-47).
- 57. Then again, it is difficult perhaps to make a design excellence case for a hole or a demolition or a mass tree-felling. Yet, this is part of the Precinct Code that the NCA tells us the EWA should be matching itself against.
- 58. There is more under 4.8.5 of the relevant Precinct Code 'Detailed conditions of planning, design and development' about how '[d]esign proposals should be site responsive'. Again, it is surprising the EWA does not say something about this: a hole dug large enough to accommodate some big new features is fairly site responsive, as is a demolition big enough to build a new structure on the same footprint, or tree-felling across the site. But, again, no joy.
- 59. It is not surprising that HG as a submitter to the process had difficulty matching the terms of the EWA to the NCA's Planning Principles and Precinct Codes. Knight Frank did not even bother to do so, perhaps knowing that, despite the Authority's claim that these are the 'go-to'

documents, they do not help much on how to dig holes, demolish buildings, and chop down trees.

60. In sum, the Knight Frank-Memorial material contains insufficient evidence for public commenters to make an assessment against relevant criteria. The documentation is confused and confusing, if not deliberately misleading. It is a bundle of word salad, complex diagrams and plans, inadequately indexed, difficult to access, and difficult to read. (For an application which claims – see above paras 45-47 – *not* to be about design it contains a lot of designs.) The Memorial is going through the motions because it has to; the NCA is constrained by the previous approval history of the project. The NCA is not constrained, however, by its 'commitment to community engagement'. If the community engages this time around it is despite the process, not because of it.

Given that this may be the last chance for meaningful public input, it is important at this stage to summarise arguments against the prospective main works applications, covering the whole project

- 61. We have argued so far that getting approval for irreversible early works is a surrogate for approval of the whole project, especially when these works are as important as the demolition of Anzac Hall, the big dig at the front of the Memorial, and the mass destruction of all those trees. Approval of these early works makes approval of the main works (MWP1, 2 and 3) redundant. The NCA's approval of these three key components, under the subterfuge of 'early works', would make the Authority's consideration of the rest of the project (due in June-August) a futile exercise. The die will have been cast irrevocably.
- 62. Against that prospect, we must look now at the whole \$498m redevelopment. The NCP says an assessment will be made in relation to adverse impacts on: public space and community amenity; environment, heritage or landscape values; amenity of the locality in terms of materials, finishes, scale, massing, design and quality; consistency with an existing Heritage Management Plan.
- 63. This section of the HG submission tries to summarise adverse impacts, taking account both of the EWA and of the information that has come to light in earlier approval processes (PWC, EPBC), in the Memorial's final preliminary documentation, and in public comment.

Public space and community amenity

- 64. The Memorial and its grounds are a valued and revered part of the public space of Canberra and Australia. The current project, justified in part by the argument that a bigger Memorial will be more attractive, have more heritage value, and bring more tourists, tramples on this tradition.
- 65. The attraction of the Memorial for 80 years has arisen from its careful balancing of the functions of memorial, museum and repository of records. That attraction will dissipate if the balance is lost. This development threatens to trash that balance.
- 66. 'Destroying such an investment of effort, culture, and family memories is a waste and a mark of disrespect ... The Australian War Memorial is one of our nation's most significant monuments.' (Australian Institute of Architects)
- 67. 'Why the haste and enthusiasm to create cavernous, soulless spaces in concrete, glass and steel under and around the main building? There are other viable and suitable options at much less cost that do not threaten irreversible harm to this iconic place.' (Steve Gower, former Director of the Memorial, 2019)

Environment, heritage or landscape values

- 68. The argument that a larger Memorial will have greater heritage value is nonsense when the extension requires destruction of large parts of the existing fabric. It will be decades before the redeveloped Memorial has an external aspect as inspiring as the existing Memorial has within its setting.
- 69. The destruction of more than 116 trees will sever the link the Memorial has with Mount Ainslie and damage the reflective, solemn atmosphere of the space. More generally, there will be an imbalance created in the landscape by overdevelopment of the Memorial building in relation to the site. This will also affect the Vista up and down Anzac Parade.
- 70. It is important that the NCA look beyond the formal sign-off by Minister Ley on the equivocal advice (the 'impacts were not unacceptable'!) from her Department of Agriculture, Water and the Environment (DAWE), to help her make the necessary decision under the heritage provisions of the EPBC Act. Both the Australian Heritage Council (AHC), the government's principal adviser on heritage matters, and the Historic Heritage Section (HHS, the heritage experts within DAWE) have identified significant impacts from the project. HHS referred particularly to how the redevelopment reduces the relative importance of the commemorative compared with the exhibition spaces of the Memorial. Other critics have described this as the creation of a 'military Disneyland'.

- 71. The AHC, apart from identifying the demolition of Anzac Hall, the work on the Parade Ground, the inclusion of the Oculus, and the expansion of the Bean Building as negatively impacting the Memorial's heritage values, made a number of other points in its submission to the Memorial in July 2020. They cannot be ignored by an Authority charged with comparing projects with the NCP. Summing up, the Council said that it 'cannot support the conclusion that the proposed redevelopment will not have a serious impact on the listed heritage values of the site' (Preliminary documentation Public comment, submission No. 152).
- 72. Finally, the NCA should not place great weight on the 29 'conditions of approval' set by the Minister. Like the NCA's own 'separate project' argument discussed above (paras 28-32) the conditions were a fig leaf to justify a controversial decision. They do not remove or substantially reduce the heritage impacts identified by the AHC and HHS. More than a third of them are standard administrative conditions. Others, such as archival recording, training staff to talk about the meaning of the form of the Memorial now wrapped in the glazed addition, and more reports and approval for any further loss in the commemorative focus, do not reduce or change the actual identified heritage impact.

Amenity of the locality in terms of materials, finishes, scale, massing, design and quality

- 73. Regarding the effect of the development to the south of the building and on the Parliament House-Anzac Parade Vista, there will be significant changes to the size and shape of the Parade Ground, loss of flanking trees, a massive new bladed façade, and potential visibility of the Glazed Link above the main building. These changes are fundamental to the nature of the Memorial; they cannot be brushed over with the Memorial's marketing hype as 'Our Continuing Story'.
- 74. Under this heading, HG notes again the remarks of DAWE's own HHS experts, particularly about how the larger Anzac Hall will impact on the overall ceremonial landscape, how the Glazed Link will reduce the relative isolation of the Memorial building, and how the Oculus will detract from the monumental character of the Memorial building. Again, the changes are fundamental.
- 75. This heading is important for another reason, too. If the NCA approves the early works and thus effectively settles the fate of the project, because any further approval process will be of minor importance the Authority will have effectively reduced its role in this project to putting a tick on the quality of paint, the resilience of floor coverings, and the heat-resistant qualities of the roof in the Glazed Link. It will be constrained on what it can do regarding the

much more important elements, Anzac Hall, the Southern Entrance and the Parade Ground, and the Bean Building.

76. If that sort of minor tweaking is all that remains for the Authority to do, that is hardly the role of a major public sector player. Yet, that is the risk it runs by approving the early works application.

Consistency with an existing Heritage Management Plan

77. Both the 2011 HMP and the draft 2019 HMP call for the retention and conservation of Anzac Hall:

- HMP 2011: 'Conserve, manage and interpret the ANZAC Hall as a part of the AWM main building' (page 95)
- Draft HMP 2019: 'Conserve, manage and interpret ANZAC Hall' (page 94).

78. The 2019 draft also says:

9.9.1 Respect the important architectural qualities of ANZAC Hall, including its external architectural form and siting which is subservient and recessive in the landscape and to the main Memorial building. Manage future change to ANZAC Hall that is sympathetic to the heritage values of the AWM (page 94).

79. The 2019 HMP review has still not been completed and endorsed; the draft was withdrawn, parked, suppressed when it became inconvenient. Those references above in the 2019 draft do not read like a building that is about to be demolished. No wonder the Memorial pulled the draft.

80. But the HMP is about to re-emerge, spruced up, as the Memorial's Director and Executive Director Development told Senate Estimates on 24 March:

Mr Anderson: We do have a heritage management plan. We were seeking to update it at the same time as we were seeking to go through the EPBC process. The advice I understand from the Department of Agriculture, Water and the Environment was to concentrate on –

Mr Hitches: I can add to that. Currently we are still operating under the 2011 plan. There was potentially a 2019 plan but, because the submission under the EPBC Act was going at the same time, the advice was to hold back to make sure that that process finalised under that current plan and then submit the revised plan. That's going

through its final edits at the moment. I can't give you an exact time, but it's in its final throes, so it will go in shortly.

Senator KITCHING: Was that advice from the department?

Mr Hitches: Yes.

(The thrust of that exchange has been confirmed for HG by an independent and knowledgeable source, not the department.)

81. So, there is no current War Memorial HMP that is consistent with the plan to demolish Anzac Hall – though the Memorial is assiduously working to remedy this situation. The management plan is itself being managed. And when it finally arrives it will be rather late, since the EPBC Act section 341X requires HMPs to be reviewed every five years.

Conclusion

82. Designating as 'early works' the demolition of Anzac Hall, the destruction of dozens of trees, and the massive southern excavation, is an abuse of process, a travesty, and an insult to the Parliament (the author of the Australian War Memorial Act), to the architects of Anzac Hall, and the people of Canberra and Australia, who continue to troop through the Memorial, barely aware of the destruction that is about to occur there. (The prime minister's Anzac Day address this year, heavy with rhetoric, included not one word about the redevelopment project.)

- 83. These so-called 'early works' will cause permanent damage to the heritage-listed Memorial and its surrounds. All for the sake of an expensive and unjustified vanity project, opposed by many, many Australians.
- 84. The NCA should defer consideration of the 'early works' until it has received major works approval applications from the Memorial for the rest of the project. It should then consider all components of the project as a single package. (There might be a case for deferring MWP4 till 2022, as the Memorial proposes.)¹⁰
- 85. When that overall consideration occurs and only then will it be possible for the NCA to do what it is charged to do:

assess this works approval application and determine the consistency of the works against the <u>National Capital Plan</u> (the Plan). The Plan [the NCA knows and we

should remember] focuses on planning matters and quality of design. These policies ensure that Canberra is a city worthy of its status as the national capital.

The current EWA, on the other hand, is a charade and the NCA should not join the game.

86. If, on the other hand, the NCA does not exercise its authority vigorously – by rejecting this application and postponing consideration of the complete project – it will confirm that the project has been a 'done deal' ever since the prime minister, on 1 November 2018, at a gala event paid for by Memorial Council Chairman Kerry Stokes, announced the funding. It will show that everything since that date – successive methodologically questionable 'surveys' by the Memorial, the Public Works Committee inquiry, exhaustive consultation leading to the EPBC decision by the Minister, hundreds of hours of work by many people inside and outside government – has been so much window dressing. Regardless of how the Memorial looks by 2028, that is not a good look for a democracy.

Appendix 1: Some problems with the National Capital Authority consultation process and documentation

- 1.1 The advice about the consultation sent out on 19 March 2021 by the NCA to people who had registered as Key Stakeholders was misleading in that it had no mention of the demolition of Anzac Hall, the bulk excavation at the front of the Memorial, or the mass tree removal. The language was generic and non-specific.
- 1.2 <u>The NCA consultation page</u> was again vague and non-specific but managed to mention the demolition of Anzac Hall in passing in the *ninth* paragraph.
- 1.3 The NCA consultation page and the whole process was unsatisfactory in the lack of information it provided to submitters (see para 49 in the submission proper).
- 1.4 The disparity between the Knight Frank documentation and the claimed role of the NCA was puzzling and the Authority's assistance to Heritage Guardians on the point did little to clarify the situation (see para 44 and following in the submission proper).
- 1.5 Given that NCA Works Approvals mostly deal with projects far smaller than the \$498m War Memorial project, the Authority needs to examine its processes for handling large projects.
- 1.6 The Authority needs to define 'major works' more precisely (see para 10 of the submission proper).
- 1.7 The NCA needs to define 'early works' more precisely, including how it deals with them. An exchange of emails between the Authority and Heritage Guardians revealed the Authority was unclear about its history of dealing with early works (see para 28 in the submission proper).
- 1.8 When it defines 'early works' the NCA needs to provide some examples of Works Approvals where early works were dealt with separately from major works, as is the case in the current EWA. It is not clear from NCA records what, if any, precedents there are for this course of action.

Appendix 2: The Memorial is not taking the National Capital Authority consultation seriously: it has regarded the project as a 'done deal' since November 2018

- 2.1 In July 2019, Trippas White, the Memorial's events contractors, <u>were tempting clients with this exciting prospect</u>: 'A new Anzac Hall will be larger and across two-levels ...' (23 July 2019). This was long before the Public Works Committee inquiry, the EPBC process, or the current NCA process.
- 2.2 War Memorial contract notices in AusTender from 2019 (<u>like REOI2020/0074</u>) said the Australian Government has 'approved' the project. Again, while the notices mentioned the prime ministerial funding announcement of 1 November 2018, they were well in advance of the PWC, the EPBC process, or the NCA round.
- 2.3 In August 2019, the then Director of the Memorial, attacking critics of the redevelopment project, said, 'The train has left the station ...', meaning further resistance was fruitless.
- 2.4 The Memorial's Deputy Executive Director Development told a consultation in Melbourne in December 2019 that the project was happening and people who had complaints should contact their MP.
- 2.5 The Memorial's Directors have said the project is not about the Memorial building (the subject of the NCA approval process) but its contents. Most recently, there was the current Director, echoing his predecessor in 2019.
- 2.6 <u>The 24 March Senate Estimates hearings</u> showed the Memorial's spokespersons were not well prepared for accountability, as it related to the NCA and generally. There was:
 - a misleading remark about how long the Memorial had been working with the NCA on the project, reducing this period by two years (see para 42 in the submission proper)
 - the Memorial's Director seeming to be unaware that there would be more than one round with the NCA
 - some evasive language about the Memorial's Heritage Management Plan (see paras 77-81 in the submission proper)
 - an odd remark from the Director, when asked about the demolition of Anzac Hall, that 'we have not and we will not start any construction related activity without the necessary approvals in place'. Which raises the questions: is demolition a 'construction related activity'? Early works approval only or major works approval, too?

Endnotes

341ZC Minimising adverse impact on heritage values

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.

¹ Environment Protection and Biodiversity Conservation Act 1999

² Email, Chief Executive, NCA, to Convener, HG, 21 April 2021.

³ Email, Chief Executive, NCA, to Convener, HG, 10 March 2021; <u>'Our staff: Planning and Design'</u>, NCA website.

⁴ Emails: Convener, HG, to Deputy Executive Director Development, AWM, 23 March 2021; reply 29 March 2021; Convener, HG, to Chief Executive, NCA, 31 March 2021; reply, 1 April 2021. The Chief Executive said, 'It is not unusual for an applicant to discuss the structure of an application with the NCA, particularly when the proposal is large and/or complex'.

⁵ Email, Chief Executive, NCA, to Convener, HG, 15 April 2021.

⁶ Email, Chief Executive, NCA, to Convener, Heritage Guardians, 10 March 2021. See also: Australian War Memorial Redevelopment Project Inter-departmental Steering Committee, Minutes, 4 April 2018-15 May 2019, released under FOI, linked from David Stephens, 'War Memorial releases material under FOI relating to \$498m expansion program: did a billionaire's personal guarantee clinch the deal?' *Honest History*, 4 October 2019 updated.

⁷ Email, Chief Executive, NCA, to Convener, HG, 10 March 2021.

⁸ Email, Convener, HG, to Chief Executive, NCA, 1 April 2021.

⁹ Email, Chief Executive, NCA, to Convener, HG, 15 April 2021.

From:
Sent: Wednesday, 28 April 2021 3:09 PM
To: Works Approval Consultation

Subject: Proposed Expansion/modification to the Australian War Memorial

Categories: Green category, Orange category

Dear National Capital Authority

I am registering my opposition to the proposed expansion to the Australian War Memorial generally and, in particular, to the proposed "early works".

The War Memorial is an outstanding building and, while it does contain some artefacts and weaponry, it is essentially a place of remembrance of those who have served our country over the past 100 years.

It is not a museum and thus should not contain more sophisticated items of war which could tend to glorify war itself. If it is necessary to display such weaponry then another venue should be selected, eg the Annexe which is located in Mitchell.

I understand the proposed "early works" include the removal of more than 100 mature trees from the memorial site as well as significant earthworks and the removal of the large Anzac Hall at the rear.

In respect to the trees, I was particularly struck last Anzac Day Dawn Service, which I commemorated on my front driveway, by the bird calls which were clearly heard during the "minute's silence". Removal of the trees will obliterate this stark awareness of the approaching dawn for future Dawn Service participants and observers. I urge the National Capital Authority to consider these issues and to take heed of the many submissions, which I understand have been made, that oppose the proposed redevelopment. Regards

28 April 2021

Sent from my iPad

The Manager, Public Consultations Australian Government National Capital Authority GPO Box 373 Canberra ACT 2601

WAconsultation@nca.gov.au

Submission on the 'Early Works' as part of the Development Proposal for Block 3, Section 39, 20 Treloar Cres, Campbell.

Introductory comment

This consultation cannot properly be considered an 'early works' consultation as, if it were to be approved, it pre-empts the National Capital Authority (NCA) approval of the whole project. If these works were approved and then the rest of the project was not approved, it would be a devastating destruction of the War Memorial. In one way, it can be seen as inordinate pressure on the NCA to give the tick to the final approval. In no way is it ethical to consider the 'early works' separate to the complete project.

Commemorative Aspect of the War Memorial

The first function of the Australian War Memorial (Section 5 (1) (a)) is "to maintain and develop the national memorial referred to in subsection 6(1) of the *Australian War Memorial Act 1962* as a national memorial of Australians who have died:

- (i) on or as a result of active service; or
- (ii) as a result of any war or warlike operations in which Australians have been on active service;"

It is clear from this that the War Memorial should retain as its essence, respect for and commemoration of our war dead.

The current development proposal does not do this, but rather will change the nature of the Australian War Memorial into a giant exhibition of large military equipment. Aircraft of various kinds including an F111, components from naval ships, Bushmaster vehicles, light armoured vehicles, a helicopter, etc will be displayed. This focus on equipment, particularly large equipment, would change the nature and scale of the War Memorial into perpetuity, from a quiet contemplative, commemorative space into a theme park for the military.

The AWM website states it that it aims ".....to tell Australia's continuing story of service and sacrifice... Through the eyes of those who have served, we will share the experiences of Australians in conflict ...This continuing story will connect the spirit of our past, present and future for generations to come."

This sounds very much like it will become much more a normalisation and a glorification of war, rather than recognising that war represents absolute misery for those who have

experienced it. More than 500 Australian soldiers have committed suicide since 2001 and many others experience Post Traumatic Stress Disorder (PTSD). This evidence of misery would be the case for all earlier conflicts, such as the Vietnam and Korean wars and WW2. That should be in the minds of people who seek to change the function of the building. This aspect of war has recently been recognised by the agreement by the Government into a Royal Commission into veterans' suicide. This current development proposal does not accord enough respect to the horrific nature of war or to the veterans who have suffered through war.

I don't believe the proposed development and the misnamed 'Early Works' recognise this primary function of the War Memorial and the effects on the people who have served for Australia. The foundation stone was laid for the Memorial in April 1929 when memories of the terrible carnage of the first World War would still have been raw. I doubt that people then would have envisaged the commemorative nature of the War Memorial being inexorably altered as currently proposed.

The proposal is being done under the requirements of the National Capital Plan (NCP), which exists to ensure that 'Canberra and the Territory are planned and developed in accordance with their national significance.' The key matters of national significance include, inter alia:

• The pre-eminence of the role of Canberra and the Territory as the centre of National Capital functions, and as the symbol of Australian national life and values..

I believe Australian values of a fair go, compassion and remembering the sacrifices of those who gave their lives for us, are not represented in this move to the glorification of war. The major resources, around \$500 million, allocated to the proposal should be directed to assistance to veterans or to other National institutions in need, such as the National Archives and National Film and Sound Archives, for preservation of our history.

Anzac Hall – Architecture and Heritage

The heritage approval given to the project by Minister Sussan Ley was given against the advice of the Australian Heritage Council and apparently against the advice of Departmental heritage experts. The Australian War Memorial is on the National Heritage List, the highest listing there is for a site in Australia apart from World Heritage listing. Such a listing should ensure that any proposed development would be approached with the greatest caution, but this has not been the case. The project is being steamrollered against the opposition of many highly respected organisations as well as a great number of Australians (amongst those who know about it at all).

Additionally it doesn't make sense to demolish Anzac Hall, a heritage listed and award-winning architecturally designed Hall which is a relatively recent addition to the War Memorial. Anzac Hall is a sensitively designed addition to the War Memorial which does not detract from the War Memorial building proper. As mentioned earlier, the Australian Institute of Architects opposes the proposed project. Photos here on the Architecture Australia website demonstrate the sensitivity and appropriateness of the design. The overwhelming consensus of architects is that its destruction is not warranted.

Are we living in an age when buildings less than 20 years old are considered 'disposable'? To destroy this Hall would be an environmentally and culturally unjustifiable act. Any replacement construction on this site is likely to dominate, and will change the scale of the

War Memorial proper, as well as destroying the eucalypts behind the hall, which haven't even had time to grow to the height that they should reach, as well as destroying other mature eucalypts and other trees on the site.

Natural environment

The Ecological Impact Assessment undertaken by Capital Ecology states (p.4, Section 2.1 Database searches) that "No 'Significant Plants and Animals' are mapped within the study area on the ACT Government's ACT mapi online mapping tool." If that is indeed the case, I believe that the ACT Government's mapping tool is deficient and may have not mapped the trees on the site properly. I applied to have a tree on my property removed and was refused permission, as it was considered a 'significant tree'. But the tree on my land was nowhere near the Breast High Diameter size of the eucalypt of the eastern foreground in the photo at Attachment 1. That tree, as can be seen from the photograph, has nesting hollows, as do other trees at the site – nesting hollows which usually take hundreds of years to form and which are of crucial importance for birds.

The Ecological Impact Assessment states (p.12 Section 2.5 Fauna Habitat and Threatened Fauna Occurrence) "A total of 15 native birds were recorded in the study area during field surveys (Appendix A). This included an observation of two rare/threatened species flying over the study area, being the Superb Parrot *Polytelis swainsonii* (EPBC Act and NC Act vulnerable) and Gang-Gang Cockatoo *Callocephalon fimbriatum*.

"As recorded during the field survey, the study area supports the following fauna habitat features.

- Fourteen mature remnant trees (Appendix B and Appendix C), one of which (Tree No. 112) contains a functional hollow currently occupied by nesting Sulphur-crested Cockatoos. All of the mature remnant trees would provide foraging resources for a variety of birds and marsupials, and the hollow bearing tree may provide a nesting resource for a variety of birds, bats, and marsupials.
- A variety of planted non-local mature eucalypt trees, consisting primarily of Blue Gum and Maiden's Gum (Appendix B).

"These species are commonly planted for native landscaping as they grow quickly and have high aesthetic value. Blue Gum and Maiden's Gum do not occur naturally in the ACT region. Four of the planted trees contain a functional hollow (Tree No. 13, 23, 51, and 93). All of the mature planted trees would provide foraging resources for a variety of birds and marsupials, and the hollow bearing trees may provide a nesting resource for a variety of birds, bats, and marsupials."

Numerous studies demonstrate that we are seeing the numbers of our birds plummeting and the creeping obliteration of natural habitat for huge numbers of species. This article reports that "Our measure showed that across Victoria, and into South Australia and New South Wales, more than 60% of 262 native birds have each lost more than half of their original natural habitat. The vast majority of these species are not formally recognised as being threatened with extinction."

We should not wait until species are listed as threatened or endangered, but should be careful that we are not dismissing small areas of habitat loss as of no importance. The over 100 trees, most in good, very good or excellent condition, which are to be destroyed in this

project, especially those with nesting hollows, are not insignificant but represent important breeding opportunities for our precious birds.

Consultation Process

As mentioned earlier, this consultation cannot properly be considered an 'early works' consultation as, if it were to be approved, it pre-empts the NCA approval of the whole project. If these works were approved and then the rest of the project was not approved, it would be a devastating destruction of the War Memorial. In one way, it can be seen as inordinate pressure on the NCA to give the tick to the final approval. In no way is it ethical to consider the 'early works' separate to the complete project.

Opposition to the project is extremely widespread as was demonstrated by an open letter in March 2019 from 83 prominent Australians. Two former AWM Directors have expressed opposition as has the former historian for the War Memorial, Prof Peter Stanley, as well as other former senior staff and senior public servants, as well as numerous ordinary Australians, such as myself.

I understand that when the War Memorial consulted people on the heritage aspects of the proposal, that only 38% were in favour of it. The consultation for the Public Works Committee elicited that around 75% of those consulted, opposed the project. The evidence is that consultation on the proposed development has been inadequate and further, that the views which have been expressed in consultations have not been taken into account.

The process of consultation has been seriously flawed and inadequate, as it has not allowed full consideration of other valid options. Treating our war dead with full respect would mean enabling all Australians to have the opportunity to know what is being planned and giving them sufficient opportunity to have their say. I don't believe that many Australians do know what is destruction planned for the War Memorial site and crucially that the development will also change the commemorative function of the War Memorial.

The Australian War Memorial is an iconic building, as dear to Australians as the Sydney Harbour Bridge or the Opera House. The proposed works will destroy the aesthetics of the building as planned by Walter Burley Griffin and as it is seen from Anzac Avenue and from Parliament House. The National Capital Plan states that developments should show 'Respect for the key elements of the Griffins' formally adopted plan for Canberra' – this development does not do this.

An enlarged parade ground would be out of scale with the building and be out of scale for the view from Parliament House and up Adelaide Avenue. The massive excavations at the front of the War Memorial will change the look of the front entrance and the essence of it into the future, and make it a huge military parade ground. That is not what a War Memorial should be. Those excavations will also destroy the magnificent eucalypts to the east and west of the entrance forever. Trees that take decades or hundreds of years to reach maturity.

It breaks my heart to think that this proposal may take place, destroying the iconic War Memorial and its commemorative function as we and our forebears, have known it.

I consider that the consultation process should be recommenced and planned so that many more Australians can participate and become aware of the plans to change the War Memorial's function. At the very least the consultation process should be extended.

I agree that this submission may be made public.

Kathryn Kelly

From: John & Diana Leech

Sent: Friday, 30 April 2021 11:48 AM
To: Works Approval Consultation
Subject: War Memorial Extension

Categories: Green category, Orange category

Hello,

We would like to make a short submission to the NCA public consultation about the extension to the AWM.

We object to the proposed extension on three grounds.

- 1. The War Memorial is intended to be, for all time, a place of Rememberance, not a museum or place of entertainment. The proposed extension will accelerate the change from Memorial to "Tourist Attraction". This is the main reason for the significant and long lasting opposition to the extension. It should not be approved because it flouts the original charter of the Memorial.
- 2. The extension will change the nature of this Heritage building and precinct. The extension should not be allowed on Heritage grounds. The present building is a beautiful thing that should not be compromised in any way. (Would anyone seriously consider an extension to the Sydney Opera House?)
- 3. If the Government had any collective foresight, it could have reserved the adjacent CSIRO HQ site or one of the ANZAC Park building sites to build a war museum. It is almost certain that the Government still owns a suitable site somewhere in central Canberra. Alternative arrangements could be made for extended exhibitions, which would not have the impacts mentioned in 1 and 2 above.

We sincerely hope that you will not approve this extension to the War Memorial.

Thank You, John and Diana Leech From: Gerald Lynch

Sent: Thursday, 8 April 2021 2:32 PM
To: Works Approval Consultation

Subject: Stop the early works for the War Memorial redevelopment

Categories: Orange category, Green category

I am writing as a resident of Canberra to express my opposition to the early works proposed at the War Memorial.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the ancient eucalypts that surround the area should be prioritised.

I also believe the NCA should release a response to all submissions it receives on this issue. And I believe that the Memorial should remain consistent with its name and cease to pursue the ambition of becoming a museum and stand-alone tourist attraction.

Sincerely Gerald Lynch

Sent from my iPhone

From: Mark StaffordSmith

Sent: Thursday, 8 April 2021 1:24 PM
To: Works Approval Consultation

Subject: Stop the current War Memorial redevelopment works

Categories: Orange category, Green category

As a long-term Canberran with family members who fought in and were traumatised by the wars, I am deeply concerned about the proposed changes at the War Memorial. I am also horrified by the terrible cultural mangling that will occur if arms companies sponsor a change from recalling and respecting the terrible sacrifices that my father's and grandfather's generation made, instead glorifying the death and destruction that can be wrought by the weapons of war.

I strongly oppose the works currently proposed at the War Memorial, and even more deeply despair of the corporatized rather than community-oriented sponsorship model that underpins them. While these longer term issues are worked through, works should be stopped in the immediate term, greater community co-design (not just 'consultation') engaged, and the collateral damage to the local forest rejected. True co-design means a much deeper openness to and engagement with the community, with full transparency about the response to this 'consultation' phase and the process going forwards.

Mark Stafford Smith

From: Amy Body

Sent: Thursday, 8 April 2021 10:44 AM To: Works Approval Consultation

Subject: Stop the early works for the War Memorial redevelopment

Categories: Orange category, Green category

I am writing as an ongoing home owner and previous long term resident of Canberra to express my opposition to the early works proposed at the War Memorial.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the ancient eucalypts that surround the area should be prioritised.

I also believe the NCA should release a response to all submissions it receives on this issue.

I am sure that on a personal level you understand that the War Memorial is big enough, serves its purpose in a fine fashion already and that of much greater importance to the local community and our environment is the preservation of green space and established trees. Please use this common sense in your work! Your organisation has the opportunity to help protect Canberra from overdevelopment and becoming an overheated concrete jungle.

Kind regards

Amy Body.



Community Consultation - Block 3 Section 39 Campbell (AWM) - Early Works Application

Comments by Lake Burley Griffin Guardians (LBGG)

April 2021

The NCA has presented a proposal for the Australian War Memorial redevelopment works for public comment. The overall works include:

- Construction of a new southern entrance and development of new lower level
- Temporary removal of the Memorial's front façade
- Demolition of the existing Parade Ground/forecourt
- Reconfiguring the Parade Ground/forecourt
- Removal of approximately 114 trees including high quality trees of the southern area of the precinct
- Demolition of the existing Anzac Hall and construction of a new, larger Anzac Hall
- Construction of a new glazed courtyard between Anzac Hall and the main Memorial building

The works are to expand the museum display space, provide visitor facilities, improve disability access and increase overall visitor capacity.

- The NCA assesses works approval application with the National Capital Plan, focusing on planning matters and quality of design.
- The NCA has noted that the development has been approved in accordance with the *EPBC Act* by Minister Susan Ley.

Lake Burley Griffin Guardians (LBGG), due to its role in protecting Lake Burley Griffin and its lakeshore landscape is making comments limited to its own organisational objectives.

LBGG notes that the existing Anzac Parade is referred to as such in the Commonwealth Heritage Listings of the place but in the National Heritage Listing, Anzac Parade a major component is referred to as the 'Memorial Parade'.

NCA has not provided information on how the works approval will be assessed against the National Capital Plan (NCP) and how the NCP's planning requirements will be considered.

The following comments both relate to the overall project and the 'early works' as this latter is an indivisible part of the whole project. In particular, this is most obvious with the proposals to demolish the Anzac Hall and remove trees (114, not including trees already removed), these are major and necessary early steps upon which most of the 'later works' are predicated. Therefore, the 'early works' cannot and should not be separated in a holistic planning and approval sense from what follows – the entire project critically requires assessment as a whole before any

works begin. To do otherwise is both inappropriate general planning practice and certainly not best heritage planning.

Comments on Impacts of the proposed works for Block 3 Section 39 Campbell (AWM) - Early Works Application

1. Significant symbolic landscape design integrating the Australian War Memorial and its Landscape Setting

The commemorative and memorial qualities of the Australian War Memorial (AWM) at the highpoint of the Memorial Parade (Anzac Parade) are most highly valued by the Australian community and have been so since the AWM was constructed in 1936 to comfort a grieving nation.

The AWM is particularly symbolic for that purpose, set within the serene context of the green canopies and beneath the green textured Mount Ainslie. The AWM, with Mount Ainslie, is a unique and dramatic northern terminus of the Land Axis that is the principal vista of Canberra, viewed in both northern and southern directions. The vista to the north has significant commemorative associations along the Memorial Parade. The Memorial Parade (also known as Anzac Parade) is a considerable component of the National Heritage Listing of the 'Australian War Memorial' and Memorial Parade'.

The native vegetation canopy of greenery covering the pyramidal form of Mount Ainslie provides an aesthetically pleasing, symmetrical, vegetated backdrop, extending to the lower slopes, that frames the AWM. This living, green drapery is extended outwards and forwards through the fanning of the planted trees around and in front of the AWM, so that the eye is led to the present domed structure arising from the greenery.

The significant array of trees of that 'fanning' framework are identified as numbers 139-145, 158-164 in the *Preliminary Aboricultural Assessment* (Canopy Group, 2021). The trees on the fans are dominated by *Eucalyptus maidenii* and *E. mannifera* on the western side and *E. mannifera* with smaller *E. pauciflora* on the eastern side. The dominating trees were strategically selected to create the canopy flanks that are lower in height from *E. globulus* ssp bicostata of the Memorial Parade but are also a sub-species of *E. globulus*. The *E. maidenii* are perfectly selected to assist in directing the eye to the AWM entrance and significantly from vistas experienced from the Memorial Parade particularly at the Lake.

The existing pathways either side of the current parade ground make a clear link to the outer edge of Memorial Parade physically and visually directing visitors to and from the Memorial Parade. The proposed new pathways make an awkward link to the Memorial Parade.

The proposal damages this clearly planned designed landscape context.

2. Significant visual aesthetic and social importance

The visual aesthetic qualities of the vista to the AWM have been most carefully created to accentuate the visual impact of the AWM emerging from the Mount Ainslie foothills with the strong form of the dome, set against the background of the natural form of the mountain.

The stepped cruciform of the AWM accentuates the domed structure of the AWM with its stone exterior. Most importantly its dome form arising from the landscape setting watched

over by Mount Ainslie, along with the Memorial Parade, has become the symbolic focus of commemoration and memorialisation for Australians. The stunning vista of the AWM is appreciated along the sweep of the northern Land Axis vista from several points but is particularly appreciated on and from the southern side of Lake where the sweep of the axis' linear landscape is offset by the flat-water plane of the Lake, and the scale of the AWM and Memorial Parade is satisfying. It is further accentuated by the red ochre coloured scoria of the Memorial Parade. Lake Burley Griffin lies astride the intersection of the 'land axis' from Parliament House to Mount Ainslie and the 'water axis', that extends from Black Mountain crossing the three central water basins approximately aligned with the water course. The scale of the Australian War Memorial is a human scale but at the other end of the axis, at Parliament House, the AWM is much reduced.

The Australian War Memorial—Heritage Management Plan—Final Report (GML report 2011:41) noted:

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.

The NCA's, Anzac Parade Heritage Management Plan (Marshall et al 2013:i-ii) recommends:

- Conserve the treescape and overall landscape character of Anzac Parade.
- Protection of views and vistas to and from the Parade.

Many of these trees are mature and significant features. Together they contribute to the AWM cultural landscape as an environmental canopy group.

Apart from their design contribution, mature trees are particularly important for total environmental health, cooling the environment and providing a habitat for wildlife, particularly birds. The trees will also have established a considerable underground mycelium network that is important in tree health.

There is also concern for the impact of the glazed courtyard that we understand will be visible as a shining surface (although said to be reduced in impact by the use of EFTE in the vista of the memorial from Lake Burley Griffin and other points along the Memorial Avenue.

3. Detrimental Impacts on the significant symbolic design integrating the Australian War Memorial and its Landscape Setting and on the significant visual aesthetic and social importance

While there is an ecological impact study with rigid scientific parameters there appears to be no impact study on the designed cultural landscape values of the landscape setting, which is so strongly significant to this place.

The *Heritage Impact Statement* (Hector Abraham Architects, 2020) while strong on the architecture, does not provide an in-depth analysis of the designed landscape's importance which the Guardians believe is a critical component of the AWM, the Memorial Avenue and the nationally significant Land Axis vista. This is not just a flaw of the Abraham report but a serious flaw and omission in the critical requirement of comprehensiveness of the suite of documents provided to the NCA to allow a proper assessment for approval of the project.

The separately provided Arborist's report only comments, as is usual in such reports, on **individual** trees and not groupings of trees, nor, more importantly, on the broader cultural

landscape and setting (including vistas of it), which are constructed in part by trees, so in this regard that report is not sufficient.

There should have been a specialist assessment of the AWM and Memorial Avenue's cultural landscape (the entire memorial precinct) and the development project's impacts on it. This is a very serious omission in the ability of those assessing the project's impacts for this Works Approval.

As noted in 1. and 2. removal of trees on the southern side of the AWM has the following impacts on the place/s:

- Removes the memorial's green drapery and opens the vista to a background of moving traffic on either side of the Memorial.
- Creates large gaps in the green canopy drapery and will be an adverse impact on the heritage aesthetic significance of the major sight line of the Memorial Avenue to the AWM.
- Destroys the carefully conceived aesthetic design of tree planting as a fanned group alongside the existing splayed pathways that extend from the AWM to the outer edge of Memorial Parade, clearly directing people access.
- Destroys mature tree features that have high environmental value and bird habitat value that is greatly appreciated by visitors.
- The proposal to install new tree plantings as straight rows either side of the proposed curved paths is inappropriate. The fanning of the tree groups and the straight splayed pathways provide the visual, physical and species link to the Memorial Parade. The names of the replacement species are not mentioned. There is no reference to trees being pre-grown so that some age and size to the replacement trees is available.
- The perception that trees can be replaced with 'safe' species and similarly-aged trees is flawed as this consistency, whilst a common design objective, is difficult to maintain over the years nature is not as compliant as soldiers in a military parade. Tree avenues frequently have odd trees damaged by lightening, storms or animal/insect/disease attack, in which case a particular tree will need to be replaced. Tree avenues can still be read as such even though there may be a few anomalous features and these add to the character and value of the avenue if they are not too dominant. It is similar for this existing fanning tree group.
- The glazed courtyard is detrimental to the vistas of the AWM because of its visibility from the Avenue and the Land Axis. (See Abraham Figs 42 and 43). This maybe further exacerbated by the degree to which EFTE reduces reflection.
- The glazed courtyard addition, by virtue of its scale and shape, will also substantially
 and detrimentally alter the reading of the AWM's important current setting and
 architectural values as seen from Mt Ainslie looking south down the Land Axis
 towards Parliament House. The comparatively modest scale AWM Hall, that is
 deliberately of human scale, will be unbalanced by the industrial size of the new
 extension complex.
- The new entrance, proposed to better manage disabled access, seems to be designed as a preferred, primary entrance to the current main entrance – stressing the direct access to the museum of objects over the commemorative function – literally, and inappropriately, undermining and downgrading the present and original entrance above.



Image from the AWM Planning Report (Knight Frank 2021) showing the fanning of the trees at the southern entrance and the way the existing pathways link to the Memorial Parade

Comments on Process

1 NCA Requirements

The heritage listed place under consideration is listed in heritage listings as follows:

- The Australian War Memorial and Memorial Parade (Anzac Parade) listed in the National Heritage List.
- Parliament House Vista listed In the Commonwealth Heritage List
- The Australian War Memorial listed in the Commonwealth Heritage List
- Anzac Parade listed in the Commonwealth Heritage List.

The NCA is required to focus, inter alia, on planning matters and quality of design in relation to the role of Canberra as the National Capital as set out in the National Capital Plan. However, Items 2.4 Liveability (2.4.1-4) of the NCP are not considered in the Abraham heritage impact assessment for the AWM redevelopment. These are NCP obligations separate to those already assessed under the *EPBC Act* by Minister Ley and even if there be some overlap these obligations need to be re-considered by the NCA to ensure their legal obligations have been met, particularly, as the Minister is able to take into account external matters in her consideration other than, say, just heritage values.

This is a critical omission in the heritage impact assessment so is addressed below.

Item 2.4.2 b The development will **not** compliment and enrich its surroundings for reasons identified above, including the Memorial Parade, vistas, the cultural landscape of the AWM and the current values of the AWM complex.

Item 2.4.2 c As noted above, the proposal does **not** contribute positively to the overall composition, symbolism and dignity of the National Capital by its reduction in the current heritage values of the AWM, particularly its symbolism, its distortion of the AWM's purpose over-emphasising the technology of war, establishing a new entrance to encourage visitors to bypass the commemorative and memorial spaces, by its disregard for the AWM's cultural landscape, particularly by removing numerous established trees, negatively impacting vistas, and its demolition of the highly valued, current, Anzac Hall.

Item 2.4.2 e It does **not** reinforce and complement the Main Avenues, it devalues Anzac Parade which is a Main Avenue as well as being heritage listed in its own right.

Item 2.4.2 h Vistas to major landscape features are **not** protected and enhanced by the development (see above).

Item 2.4.2 j Opportunities are **not** encouraged for enhancement and reinforcement of the physical, symbolic and visual linkages to adjoining areas of the Inner Hills and the Central Area but are devalued by the proposal (see above).

Item 2.4.4 c The proposed development is **not** consistent with both the relevant HMP's – for the AWM and Anzac Parade (see above).

Item 2.4.4 d The use and presentation of heritage places is **not** consistent with heritage values (see above).

Item 2.4.4 e The proposed development, within the Designated Area is **not** consistent with the Burra Charter as required.

The proposal and the process of determining appropriate works are grossly inconsistent with the following Burra Charter Articles:

- 2 Conservation and Management
- 3 Cautious Approach
- 5 Values
- 6 Burra Charter Process
- 7 Use
- 8 Setting
- 9 Location
- 11 Relate Places and Objects
- 12 Participation
- 13 Coexistence of Cultural Values
- 14 Conservation Process
- 15 Change
- 17 Preservation
- 21 Adaptation
- 22 New Work
- 24 Retaining Associations and Meaning
- 26 Applying the Burra Charter process, and
- 27 Managing Change.

2 Damage to the Memorial Parade Vista

The emotional and visual aesthetic value of the heritage listed place, the Memorial Parade, has been disregarded in the heritage impact assessments.

As stated in Item 2 the NCA is not following the recommendations of its own Management Plan for Anzac Parade (referred to a Memorial Parade in the National Heritage Listing)

There is no heritage impact study on the proposed development on the Memorial (Anzac) Parade. The Memorial Parade is one of the most important linear route landscapes in Australia with the AWM and Mount Ainslie as its terminus.

The removal of trees at the southern entrance has been treated extremely casually by the proposal considering they are the fabric of the memorial precinct and have been developing for the last 50 years. To simply state, without further detail and justification, that the trees will be replaced in a different configuration and as a safe species, potentially, significantly compromises the careful approach required for the vulnerable cultural landscape of the memorial precinct.

The proposed removal of the trees and their proposed replacement is seriously flawed. The role of the fanning canopy with existing paths will be negated in the Memorial Parade vista due to the proposed replacement trees now being shade avenues for the proposed public pathways. There is no explanation why these new routes, that involve destruction of significant trees forming the green drapery around the AWM, were selected or what options to exclude the trees from removal were considered.

3 Ground-swell of community concern against the development

LBGG supports the report made by the Hon David Kemp AC, on behalf of the Australian Heritage Council in their preliminary submission of 31 July 2021 which details the many inadequacies and threats to the listed heritage values posed by the proposed development.

LBGG also supports the strong statement against the proposed development made by reputable organisations and 80 eminent individual Australian history and other relevant scholars in their letter to Prime Minister, the Hon Scott Morrison MP, on 22 October 2020.

LBGG is aware of a number of media articles in *the Canberra Times*, *the City News, ABC News*, several articles in *the Guardian*, and others. These articles reflect community concern against the AWM development.

Conclusion

There has been no, thorough, impact study on the designed landscape of 'the AWM and Memorial Parade as a national heritage precinct and the role of the landscape setting'. This is a significant omission as the iconic AWM will undoubtedly and unfortunately be considerably damaged to satisfy a mis-guided vision of the AWM's purpose.

The aesthetics of the commemorative and memorial vista have so far been ignored in this depauperate project planning and proposal.

The project should be assessed, in-keeping with best planning, including heritage planning, practice not just any 'early works' – the overall project is indivisible from its inherent dependencies.

Importantly, the proposed development is inconsistent with the NCP (2.4), the NCA's own statutory guiding document, in many respects and so should be delayed until substantially re-designed or abandoned, as it is difficult to consider with such NCP conflicts how the project could be approved by the NCA without further assessment of the relevant cultural landscape impacts and significant changes to the project design.

It is hoped that the NCA's consideration of the WA for this patently flawed project, and highlighted already in numerous community and expert comments, will lead to some significant changes to the project, affirming the community's faith in the NCA's independence and integrity of its decision-making in protecting this icon and its context, the nationally important heart of Canberra.

Richard Morrison and Juliet Ramsay Lake Burley Griffin Guardians 20 April 2021 From: Ann Smith

Sent: Thursday, 8 April 2021 10:21 AM
To: Works Approval Consultation

Subject: Stop the early works for the War Memorial redevelopment

Categories: Orange category, Green category

I am writing as a Canberra resident to oppose the early works proposed at the War Memorial.

The early works should be stopped immediately, any further redevelopment should involve thorough community consultation, and the preservation of the ancient eucalypts that surround the area should be prioritised.

I also believe the NCA should release a response to all submissions it receives on this issue.

Finally, I believe that half a billion dollars could be so much better spent on much more urgent needs in Australia. While that's not within the NCA's remit, ensuring the very careful development of the national estate within Canberra is. This should start with the preservation of the award-winning ANZAC Hall and the use of other facilities in Mitchell for the display of any extra military hardware.

Looking forward to your public response, Ann Smith From: Bruce Pittard

Sent: Wednesday, 28 April 2021 4:58 PM
To: Works Approval Consultation

Subject: AWM redevelopment

Categories: Green category, Orange category

I object to one of the redevelopment proposals of the War Memorial. While I am somewhat ambivalent about whether the AWM should become more of a museum and less a memorial, I object to the wanton destruction of ANZAC Hall.

The hall is just 20 years old and to destroy it is a waste of the resources and effort that went into building it. There's also an unnecessary environmental cost to its removal even if much of it can be recycled.

Any redevelopment of the AWM site should be on the basis of no material modification of buildings with architectural significance. If this results in a scaled down redevelopment then so be it.

Regards

Bruce Pittard

From: aekent

Sent: Thursday, 29 April 2021 8:24 PM
To: Works Approval Consultation

Subject: Australian War Memorial: NCA Consultations on Early Works

Categories: Green category, Orange category

Submission to the National Capital Authority: The Australian War Memorial

I write in defence of the proper powers of the National Capital Authority (NCA), as well as of my own vision of the place of the Australian War Memorial in our history.

Floating in the distance above the lake, at the end of a long road, the pure white dome of the Australian War Memorial is softened by surrounding eucalypts, but in form is as simple as death itself. Perfect in its symbolism, with its hint of mystery and remote lands, it is beloved by all Australians. It appears untouchable, in its beauty and strength and remembrance of things past.

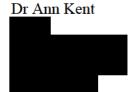
And yet...we read that a War Memorial project of \$498 million proposes a radical change to this serene picture, and that the NCA is currently being requested to approve 'early works' essential to this project. These are works which will prevent any future change of mind or plans relating to the proposed project, in the form of the removal of dozens of eucalypts, the demolition of Anzac Hall and massive excavations at the Memorial entrance.

How is this possible? The NCA should not allow such 'early work', which already closes the door on any possibility of a rethink of the proposed project, to be judged separately from the entire project itself. Already shocked by the thought of such an atrocity as the project proposals being wrought on our beloved War Memorial, we, the public, would be further traumatised by this deliberate request to the NCA to deny its own powers. The NCA should not be treated in this demeaning way, but should be allowed its right to freedom of choice over the entire project. Indeed, it should demand this.

Finally, I join countless others in making a simple request of the NCA. The Australian War Memorial is already perfect, as a building, in its symbolism, and in its heritage. It holds our memories and its form reflects both the origins of those memories and the simplicity of the suffering and often, death, of those sent to serve.

Please do not allow the proposed project to proceed. Please do not reshape, and chip away at, the Australian War Memorial, this jewel in our crown.

Ann Kent



Sent from my Samsung Galaxy Tab A on the Telstra Mobile Network

I object strongly to the plans to expand the War Memorial.

No one I know supports it, and many leading historians, architects, senior public servants, and former directors of the institution have trashed the plans.

What does it take to stop this vandalism, as pointed out in the lead letter to the Canberra Times one day?

It is a disgraceful waste of money which should be directed to ex-service people and other worthy projects. If more war equipment storage areas are needed, a much more economical revamp of the Mitchell facility could take place.

The NCA should knock this expansion on the head.

From: Info

Sent: Friday, 30 April 2021 11:18 AM
To: Works Approval Consultation

Subject: FW: PROPOSED EXPANSION OF THE AUSTRALIAN WAR MEMORIAL

[SEC=OFFICIAL]

Categories: Green category, Orange category

OFFICIAL

-----Original Message-----

From: POWELL Tony

Sent: Friday, 30 April 2021 10:17 AM

To: Info <info@nca.gov.au>

Subject: PROPOSED EXPANSION OF THE AUSTRALIAN WAR MEMORIAL

Members of the NCA,

As a former Commissioner of the NCDC and as a practicing town planner and civil engineer I am writing to express my professional concern about aspects of the proposed expansion of the Australian War Memorial which, if constructed in the manner that has been publicised in the press (ref. The Canberra Times April 10th 2021) would be significantly altered from being solely a memorial to service men and women who have fought and died in war for Australia, to become more like a museum devoted to the weapons of war such as war planes, tanks, weaponry and suchlike.

In other words, the NCA as a place of solemnity, remembrance and mourning would be added to and its overall character substantially altered. Basically this would happen because it would become more like a museum with a much larger display of military hardware than it has at present and, as it happens, is the section of the Memorial that is most popular with children.

The overall Memorial site is something of a 'dogs breakfast' with numerous displays outside the main building, such as statues, guns tanks and so forth that in recent years have progressively reduced the solemnity of the Memorial and witch now really needs to be recaptured.

On this point it is important to keep in mind that the AWM is the national version of the memorials that arose in every city and town in Australia after the First World War to mark the names of soldiers from that place, who lost their lives for Australia in battle, so that they will be remembered, honoured and morned on every Anzac Day. They are not, however, memorials to those who fought and to how and why they did so.

It is obvious to me that the main building does need to be reconstructed so that the lower levels, which are a labyrinthine of small spaces and pillars, need to be reconstructed to create larger areas for display and visitor movement, however, there is no obvious reason why the ground floor display area, which is a relatively new part of the existing building, needs to be made substantially larger to such an extent that the overall Memorial as a cluster of buildings becomes collectively more like a museum and less like a memorial.

Anzac Parade was planned, designed and constructed by the NCDC as one of its first large scale developments in the mid-1960's, in which tree planting was a key element in the form of twin lines of trees on each side between Parkes Way and Fairbairn Avenue (Anzac Park) together with mass planting of what is now Remembrance Nature Park and where the AWM wants to clear 160 or so trees for car parking and other works. The underlying aim of the

Commission was to fulfil Walter Burley Griffin's intention to ensure that the setting of the War Memorial building was aligned, not with Washington's layout or the gardens of the Palace of Versailles, but with Andre Le Notre's immense park-like setting of the Chateau Vaux-le-Vicomte (1655-61), which became the model of enhancing architecture by embedding it in gardens and lakeland settings extending to the far horizon of land and sky that has become worldwide. All of this was Griffin's intention that has taken more than 65 years for this planting to mature and so there needs to be a strong justification before the AWM is allowed to destroy it and turn it into car parks.

For your collective consideration,

Anthony Powell AO

OFFICIAL

From: Clare Conway

Sent: Friday, 30 April 2021 10:21 AM
To: Works Approval Consultation

Subject: Stop the early works for the War Memorial redevelopment

Categories: Green category, Orange category

I am writing as a Canberra resident to express my strong opposition to the proposed changes to the War Memorial. I object on several grounds:

- The plan to demolish Anzac hall, which is only 20 years old, to take down 100 beautiful healthy trees around
 the Memorial and to dramatically change the entrance will destroy the dignity and aesthetic of the
 Memorial
- The Memorial is a national heritage building and should not be damaged in this way.
- The plan conflicts with the National Capital plan and does not align with Australian values or with the purpose of the War Memorial which is a place of commemoration to honour those who have died in war. Australia does not want to be seen as glorifying war.
- The Memorial should not be a place to display yet more of the Australian 'war machine', but should be a place to show the horrors of war and the importance of peace.
- The expenditure of approximately \$500 million on this plan is unjustified, not only because it is destructive but in light of other iconic institutions in Canberra which are arguably more in need of funding.
- The consultation process has been minimal and misleading; many people thought it was a 'done deal' from the outset and didn't realise they could submit their views. The early works should not proceed without widespread community consultation.

I request that the NCA publish the submissions it receives in full; there is wide opposition to the plan and I hope the NCA does not allow it to go ahead.

Ms Clare Conway

From: Julie Skate

Sent: Saturday, 10 April 2021 11:23 AM

To: Works Approval Consultation

Subject: redevelopment of AWM

Categories: Orange category, Green category

To whom it may concern

I wish to relay my concerns about the proposed redevelopment of the AWM. I do not believe that there has been adequate community consultation and prior to any further redevelopment this should be a priority. The demolition of the the award winning Anzac Hall designed by Denton Corker Marshall will be a considerable loss to the built environment of Canberra and the reasons for the demolition are spurious at the least; adding to this insult is the removal of trees.

Sadly, the AWM is moving away form its mission and vision with corporate sponsorship, minimal consultation and limited acknowledgement of our First Nations Peoples. It will no longer be a place of quiet reflection and that is to its detriment.

Regards

Julie Skate

From: Erika Schwarze

Sent: Saturday, 10 April 2021 7:53 AM To: Works Approval Consultation

Subject: Stop the early works for the War Memorial redevelopment

Categories: Orange category, Green category

I am writing as a resident of Canberra to express my opposition to the early works proposed at the War Memorial.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the ancient eucalypts that surround the area should be prioritised.

I also believe the NCA should release a response to all submissions it receives on this issue.

Erika Schwarze

Sent from Yahoo Mail on Android

From: Simon Clarke

Sent: Friday, 30 April 2021 8:02 AM
To: Works Approval Consultation

Subject: Stop the early works and destruction of Anzac Hall.

Categories: Green category, Orange category

We are writing as residents of Canberra to express my opposition to the early works proposed at the War Memorial. This is Australia's heritage which is being tampered with. It is far more than a suburban development.

We believe such re-development is contrary to the National Capital Plan and the vision of the founding fathers. The development, as planned, will destroy public space, seriously damage the amenity of the AWM and spoil the reflective character of the memorial.

The proposed destruction of 116 mature trees is contrary to all practical and aesthetic guidelines. It will leave the front of the AWM as a soulless shell.

The plan to bypass the commemorative area completely subverts the legislative purpose of the AWM "to commemorate Australia's dead." The AWM's primary purpose is as a memorial, not a museum - this solemn purpose MUST be protected.

The previous "consultation" has been characterised by drip feed of vital information, misrepresentation and loaded surveys. The fact that the PWC received the most submissions ever in it's deliberations should show how important the issue is regarded in the community.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the eucalypts that surround the area should be prioritised.

The NCA has a solemn duty to maintain the nation's capital for the benefit of the whole nation. This must mean that this project cannot proceed in its present form.

I also urge the NCA to release a response to all submissions it receives on this issue.

Sincerely,

Simon & Beverley Clarke; Anne Brown; Beth and James Campton.

From: Jo Vallentine

Sent: Wednesday, 31 March 2021 2:01 AM

To: Works Approval Consultation Subject: Australian War Memorial

Categories: Orange category, Green category

Submission re. expansion /alteration of Australian War Memorial:

To Whom it May Concern

I am deeply disappointed to hear that an abuse of process is about to occur regarding the proposals for the Australian War Memorial "upgrade"....the latest being that early works might proceed BEFORE any formal approval is given for the project. Removing trees is especially unwise for a proposal which may not be given the green light – once they're gone – too late!

No sod should be turned until the full due process has unfolded. The National Capital Authority must be given the opportunity to undertake detailed scrutiny and assessment of all aspects of the proposal, without action already being taken by eager developers.

Yours sincerely,

Jo Vallentine

From: Dianne Garner

To: Thursday, 8 April 2021 11:32 AM Works Approval Consultation
Subject: War Memorial redevelopment

Categories: Orange category, Green category

I wish to express my opposition to the proposed extension of the War Memorial.

It is unnecessary and a waste of money. The funds allocated for this should be reallocated to improving the lives of veterans.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the ancient eucalypts that surround the area should be prioritised.

Dianne Garner

Sent from Mail for Windows 10

From:

Jillian Schedneck Thursday, 8 April 2021 9:50 AM Sent: Works Approval Consultation To:

Subject: Stop the early works for the War Memorial redevelopment

Categories: Orange category, Green category

Hello,

I am writing as a resident of Canberra to express my opposition to the early works proposed at the War Memorial.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the ancient eucalypts that surround the area should be prioritised.

I also believe the NCA should release a response to all submissions it receives on this issue.

Thank you for your attention.

Best wishes, Jillian

Jillian Schedneck, Ph.D.

Elizabeth Truswell From: Tuesday, 27 April 2021 10:42 AM Sent: Works Approval Consultation To: 'Early works' in AWM expansion Subject: Categories: Green category, Orange category I write out of concern for the so-called 'early works' in relation to the project to grossly enlarge the War Memorial, which includes the significant destruction of its surrounds. Some of the activity surrounding this is classified as 'necessary' early work. The destruction of the architecturally outstanding Anzac Hall is but one feature of these early works that has been roundly condemned by both the Australian Institute of Architects and the general public. Another alarming aspect of what has been proposed is the removal of up to 100 existing trees from the area surrounding the existing building. Most of these trees are mature eucalypts, some estimated to be at least 80 years old. This proposal is curiously at odds with wider thinking – with the tradition of trees as markers of memorial, a tradition that can be seen in small towns and major cities. Many of these memorial trees have been specifically planted, such as the 1700 trees that line the roads in Kings Park in Perth. But in Canberra many of the trees scheduled for destruction are already part of the natural landscape surrounding the existing memorial. In Canberra, the so-called 'bush capital'. This is a bonus, and any replanting of trees after this destruction would be at odds with the sense of this city and its surrounds. Of course there would be many years of potential growth lost, and the end result is unlikely to ever reflect the atmosphere of an earlier, and very original, national capital. It is all too easy to conjure up what might have been achieved by other significant national institutions had they had access to funds comparable to those allocated to the AWM. All, such as the National Library, the Film and Sound Archives, the National Archives, and the National Gallery have similar roles to those embraced by the War Memorial. These institutions hold, make public, and protect, the stories of Australia and Australians – no less than does the War Memorial, yet their funding remains insecure and inadequate. Yours sincerely

Dr Elizabeth Truswell. .



From: WorksApproval

Sent: Monday, 3 May 2021 9:37 AM To: Works Approval Consultation

Subject: FW: emailed submission failure - URGENT [SEC=OFFICIAL]

Attachments: Submission - Australian War Memorial early works approval application

Categories: Green category, Orange category

From: Info <info@nca.gov.au> Sent: Monday, 3 May 2021 9:34 AM

To: WorksApproval < WorksApproval@nca.gov.au>

Subject: FW: emailed submission failure - URGENT [SEC=OFFICIAL]

OFFICIAL





OFFICIAL

From:

Sent: Saturday, 1 May 2021 8:54 AM

To: Info < info@nca.gov.au >

Subject: emailed submission failure - URGENT

Yesterday (30 April at about 2:30pm) I made a submission by email to the NCA on the works approval submission for the "early works" of the Australian War Memorial's redevelopment project. I sent it to the email address given by the NCA – <u>WAconsultation@nca.gov.au</u> Submissions closed at close of business yesterday.

I received a report that the email failed to be delivered, which I only read this morning (Sat 1 May). (report attached)

I would be grateful if you could pass on my submission (reproduced below) to whomever is processing the public submissions please.

Thank you
Graham Rayner

The NCA has invited submissions from any interested party on the works approval application for "early works associated with a redevelopment project at the Australian War Memorial".

The NCA makes it clear (1) that its consideration of the application will be confined to determining "the consistency of the works against the <u>National Capital Plan</u>." Furthermore, the NCA states that "construction of new exhibition spaces, research and arrival facilities will form part of a future works approval application". That is, the current works approval application is to be viewed as a stand-alone application. It must be assumed that the future works approval application, which will result in a new-look AWM, will also be assessed against the National Capital Plan.

The NCP was created to guide and limit development of the capital city in terms of the (finished) appearance, functionality and amenity of land development within the urban environment and its surrounds. There are no provisions within the NCP of the appearance, functionality and amenity of development projects as they are being evolved. Ergo, if the NCA is to assess the current "early works" application against the NCP without reference to the "future works approval application", it **must** do so on the basis that the outcome of the "early works" will be permanent.

In summary, the current "early" works approval application proposes to:

- (a) Erect 2.1m high hoardings around most of the Australian War Memorial;
- (b) Demolish the existing Anzac Hall, leaving a barren ground site behind the main building of the AWM;
- (c) Remove all of the trees in front and to the sides of the AWM; and
- (d) Create a very large open excavation in front of the AWM at the head of Anzac Parade, without any remedial landscaping measures.

It is also noted that the redevelopment of the AWM is envisaged to take 7 years to complete, which in my long experience of managing major government projects will translate to 10 years in reality. Thus the "early" works will indeed be permanent (noting that the current Anzac Hall is only 20 years old and was regarded as permanent).

None of these "early works" remotely satisfies the National Capital Plan if they are viewed as being permanent, as they must be if they are to be viewed in isolation from any later approvals process:

- visually, the proposed brightly coloured hoardings, 1.25km long, do not blend into any of the landscape of the Anzac Parade, Treloar Crescent, Campbell and Reid environs, indeed any of the ACT's environs;
- the excavations at front and rear of the site will result in clouds of airborne soil <u>at all times</u>, being both unpleasant to visitors to the AWM and a very serious problem in the management of dust throughout the memorial's main building, its historical collections, the Pool of Remembrance and the tomb of the unknown soldier (the average monthly wind speed is 10 kph all year, from a westerly direction (BoM) – straight into the entrance to the AWM); and
- removing about 100 mature trees is not ecologically acceptable in this day and age, to say nothing of their commemorative significance.

Furthermore, the "early works" do not contribute to the environment of commemoration and remembrance of military service that is a primary focus of this part of the national capital and which is reflected in the NCP.

It is to be noted that although the AWM is included in the Constitution Avenue and Anzac Parade precinct (code 4.8), there is no "location specific" guidelines for the AWM site as there is for the C5 development.

If the NCA is to maintain that the "early" works approval application is to be assessed against the NCP, then it **must be denied**, both from the fact that they do not meet the intent of the NCP and the fact that in order to properly assess the whole project against the NCP then the "future" works must be included in the consideration. Only the works as a whole should be considered against the NCP.

Yours sincerely,



(1) https://www.nca.gov.au/consultation/block-3-section-39-campbell-australian-war-memorial

From: Sent:

Thursday, 8 April 2021 1:41 PM Works Approval Consultation To:

Subject: Stop the early works for the War Memorial redevelopment

Categories: Orange category, Green category

To the National Capital Authority:

I am writing as a resident of Canberra to express my opposition to the early works proposed at the War Memorial.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the ancient eucalypts that surround the area should be prioritised.

I also believe the NCA should release a response to all submissions it receives on this issue.

Sincerely,

From: Elizabeth Baxter

Sent: Thursday, 29 April 2021 5:59 PM
To: Works Approval Consultation

Cc:

Subject: Submission on alterations

Categories: Green category, Orange category

To the National Capital Authority,

Dear Members,

The plans for the alteration of the War Memorial seem to ignore the emotional importance of historical sites.

The initial steps proposed namely, the destruction of the Hall of Remembrance and the forecourt, will rob future generations of important pieces of their history, memorials erected during the lifetimes of our First World War veterans to commemorate those who served and died. Veterans of more recent wars still find comfort and inspiration in the visible signs of the honour paid to those earlier men and women by those who knew them and had shared their sufferings.

If you pull the original monument down or alter its appearance significantly you lose that emotional and historic importance, even if you build something else on the site.

We have a very effective War Memorial and museum in Canberra at the moment, one of the best in the world, and particularly effective because of its relative modesty. It is symbolic of the way we like to think our country, modest, democratic and peace-loving. We do not need a vast building which would inevitably seem to glorify war (and would probably never receive the amount of funding it would need for upkeep and running costs.)

The cost of the full alterations is obscene if spent on one building, especially while assistance for returned servicemen and their families still lags.

Yours sincerely, Elizabeth Baxter

Submission to consultation: Block-3-section-39-campbell-australian-war-memorial

I consider that the NCA must not approve the development application because the proposed work is inconsistent with the National Capital Plan and with Canberra's role as the symbol of Australian national life and values.

As the NCA is aware, the AWM is included on the National Heritage List because, 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.'

The preliminary works (if approved) would result in an increase in the size of the War Memorial and hence increase its physical representation relative to other buildings in the Parliamentary Vista (particularly the old and new Parliament Houses).

The works would therefore misrepresent the balance between the AWM, Anzac Parade and the old and new Parliament Houses, all of which are important parts of Australia's social fabric.

Put more simply just because around 80 years have passed since the AWM has opened and Australia has been involved in more conflicts, that does not mean that 'war' has become a relatively more important aspect of Australia's national life or values. Indeed, since 1945 Australia has (thankfully) not been involved in another world war, arguably 'war' has become a relatively less important aspect. I am prepared to discuss this submission with the NCA Board.

28/4/21

Regards

Bruce Paine

From: Emma Kipling

Sent: Monday, 12 April 2021 9:55 AM

To: Works Approval Consultation

Subject: Stop the early works for the War Memorial redevelopment

Categories: Orange category, Green category

I am writing as a resident of Canberra to express my opposition to the early works proposed at the War Memorial.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the ancient eucalypts that surround the area should be prioritised.

I also believe the NCA should release a response to all submissions it receives on this issue.

Emma Kipling

Sent from Mail for Windows 10





National Capital Authority, CANBERRA ACT 2600

By email: WAconsultation@nca.gov.au

Australian War Memorial - Bl.3 S.39 Campbell

Thank you for the opportunity to express my concerns about the current proposal to extend the AWM exhibition space and, especially, the preliminary works.

The War Memorial is, first and foremost, a memorial to the men and women who have risked their life to protect other Australians. The fact that it is located on a significant axis between Parliament House and Mt Ainslie, at the head of Anzac Parade, indicates the importance attached to this memorial after the end of "the war to end all wars". Even the trees planted on the surrounding grounds have significance in commemorating the sacrifice of so many.

Whilst it has always had a small museum as a backdrop to the Memorial itself, my early impression was that the memorabilia was largely designed to illustrate the conditions endured by those in the battle zones, along with an explanation of the battles in which they participated during World War 1. It was not until 1968-70 that the museum area was expanded to cover other wars and to include more artefacts from those wars. At this time, the museum concept started overtaking the memorial significance.

The construction of Anzac Hall in 2020 made the place into more of a museum than a memorial but was relatively unobtrusive behind the main memorial building. While it was interesting to see planes etc. that we had viewed in war movies at the theatre and on TV, these items still felt rather uncomfortably out of place in connection with a memorial to sacrifice.

Twenty years later, it is now proposed to demolish this relatively new building to replace it with a much larger one to accommodate more vehicles, armaments and other equipment used in the many subsequent wars in which Australians have participated. Not only is this environmentally wasteful, it is also idolising warfare and switching the emphasis from the sacrifice of our fellow Australians to admiration of the tools of war. How long will it be before yet another demolition and extension of the museum area will be necessary to pay homage to future wars?

The term "ANZAC" applies to the men and women, not to the equipment they used. I believe a war museum should be constructed on another location totally separate from the memorial and outside the Parliamentary Triangle and its lines of sight, so that it does not imply that our Government and our people are warmongers. This would also be more economic as it would not involve demolition and disposal of building materials. The money saved could then go towards any costs involved in acquiring a new site.

Conclusion

I have lived in Canberra since 1971. My experience of this city since then, leads me to believe that approval of this proposal is ill-informed and inappropriate. It is disappointing that the people who made the decision to proceed apparently lack an understanding of the background and the purpose of Australia's War Memorial. The exhibition galleries in the main building should only be used to display selected items that provide background to the sacrifice of war.

I note that the NCA website states that:

On 22 February 2021, the Australian Parliament's Public Works Committee recommended that the House of Representatives resolve that it is expedient to carry out the Australian War Memorial Development Project. The need for the expansion or the cost of the development are not matters for the NCA to reconsider.

and:

The National Capital Plan (the Plan) is the strategic plan for Canberra and the Territory. It ensures that 'Canberra and the Territory are planned and developed in accordance with their national significance.' The key matters of national significance include:

• The pre-eminence of the role of Canberra and the Territory as the centre of National Capital functions, and as the symbol of Australian national life and values.

As outlined above, I consider the proposed extension to be contrary to this key matter of national significance as expansion of the museum section of the War Memorial is contrary to its original intent in that it conveys an image of Australian national life and values that implies obsession with and support for war. Further, the proposed preliminary works appear to pre-empt the final plans which suggests the process is being manipulated to ensure the development proceeds.

Tree removal

Given our need to maintain green cover to reduce the heat island effect as our climate warms, it seems counterproductive to remove any established trees with a useful canopy. The need for larger car parks to service a larger museum increases the permanent tree loss. Removing and replanting in other areas simply reduces the green cover in the near future and contributes to accelerating climate change. It also demeans the purpose in planting those trees originally.

For these reasons, I seek delay in starting the preliminary works until further consideration of the desired outcome.

Yours sincerely,

Robyn Coghlan

28 April 2021

From: Marion Hayes

Sent: Friday, 30 April 2021 2:17 PM
To: Works Approval Consultation
Subject: Redevelopment of War Memorial

Categories: Green category, Orange category

Hi

Please - please - please bring some sense & logic to the table on this appalling waste of \$500million which will transform an existing national treasure into a desecration of the original intention to commemorate the sacrifice of so many Australian lives. It risks becoming a glorification of the various wars engaged in my Australian (& other allied) governments for the sake of one director's ambitions.

Surely such a very large amount of money would be more properly spent - given the excellence and international recognition of the existing War Memorial - on minimising the residual impact of past wars on Australian veterans and society as a whole.

Please reverse this proposal & prevent the dreadful waste of money, the mockery of sacrifice and underlying memories of "lost" Australians as well as the unnecessary damage to the surrounding natural environment.

Sent in hope of a more rational approach, Marion Hayes Great-Niece, Daughter, Aunt & Sister of past & present veterans since 1916.

Sent from my iPad

From: Alastair and Amy MacIntyre

Sent: Friday, 30 April 2021 8:19 AM
To: Works Approval Consultation

Subject: Stop the early works for the War Memorial redevelopment

Categories: Green category, Orange category

We have been residents of Canberra since 1963 and write to express our opposition to the early works proposed at the War Memorial. The trees adjacent to the memorial have been an integral feature of this area for many years and should be preserved.

We believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the eucalypts that surround the area should be prioritised.

We also believe the NCA should release a response to all submissions it receives on this issue. The estimated cost of this project alone is sufficient justification to thoroughly re-examine its cost and benefits.

Yours sincerely

Alastair & Amy MacIntyre

From:

Claudia Cresswell
Saturday, 10 April 2021 3:20 PM Sent: Works Approval Consultation To:

Stop the early works for the War Memorial redevelopment Subject:

Categories: Orange category, Green category

Dear NCA staff,

I am writing as a resident of Canberra to express my opposition to the early works proposed at the War Memorial.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the ancient eucalypts that surround the area should be prioritised.

I also believe the NCA should release a response to all submissions it receives on this issue.

My Father was a decorated war hero in WW11 and the Korean War. I believe he would be horrified by the expansion of the War Memorial in these times of upheaval. The money is better spent elsewhere.

Please follow appropriate community consultation guidelines and halt the early works.

Kind regards, Claudia Cresswell From: Julia Newton-Howes

Sent: Sunday, 11 April 2021 8:52 PM To: Works Approval Consultation

Subject: Public Consultation Submission: Early works associated with the redevelopment of the

Australian War Memorial, Canberra

Categories: Orange category, Green category

Dear Madam / Sir

In regard to the call for submissions relating to approval of 'early works' including demolition, excavation, services relocation, temporary hoarding and tree removal, I am writing to lodge my strong objections to the approval of these works before full approval for the entire program has been received.

As a resident of the suburb adjoining the War Memorial, I am a frequent visitor to its grounds and gardens. These provide a wonderful amenity to Canberra residents and visitors in large part because of the majesty of the ancient trees, the beautiful views across the historic precincts to Parliament House and the deep national significance of the memorials in the gardens. The flow of trees from Mount Ainslie around the War Memorial provides a haven of calm in Canberra's increasingly hot summers and critical habitat for native birds, animals and insects. The old and well-maintained trees are an integral part of visitors' enjoyment of the site.

The controversial proposal to demolish Anzac Hall has not yet been approved. The proposed 'early works' make no sense without this decision and will have a major detrimental impact on the site, for visitors, for wildlife and indeed for climate change. Any decision such as this is inseparable from the project as a whole.

The Preliminary Arboriculture Assessment pdf shows at least 65 trees at the Memorial as 'likely to be removed', most of them in 'good' or 'very good' condition. The list includes some massive eucalypts at the front of the Memorial. These trees were assessed this year. There were also trees assessed in 2019 and it is unclear how many additional trees would go because of that assessment. Whether the total number is 65 or more, perhaps much more, this would change the look of the Memorial for decades to come. It should not be considered 'early work'.

The proposed massive excavation south of the existing Southern Entrance and across the Parade Ground would fundamentally change the look of the Memorial and should not be considered an 'early work'.

I am deeply concerned that these proposed 'early works' represent an abuse of process and will cause permanent damage to the Heritage-listed Memorial and its surrounds when the overall approval is still under consideration. The NCA should defer consideration of these 'early works' and consider all components of the project as a single package.

Yours faithfully

Dr J Newton-Howes AM

From: Carla Jaffe

Friday, 30 April 2021 3:38 AM Sent: Works Approval Consultation To:

In defense of the trees Subject:

Categories: Green category, Orange category

In defence of the one hundred and sixteen:

I knew them well - most of them - these 116 trees. Walking in to work in the morning, I lurched from ink blot to ink blot of their shade; in the evening, I began the walk home strolling among birds I never saw anywhere else in the ACT. I remember also the cockatoos sounding off in the trees at daybreak at the close of the dawn memorial services. If you cut down these trees, these birds will be gone also, with another loss of habitat. Visitors from overseas will miss a fringe benefit of the Memorial, the landscape and life forms that make it essentially, uniquely, Australian.

They might miss also the trees along Treloar Drive that commemorate the fallen for whom at that time there was no commemorative niche in the official galleries. I do not know if these are still standing, still marked, or are among the 116 trees to be removed.

For me, the trees brought solace. I had the job with the highest negative content in the place — Editor — negative because I had to correct text, often describing painful events, in an attempt to ensure effectiveness of expression (preferably without adjectives and absolutely no euphemisms permitted). We worked together in a medium that dignifies the indignities of conflict. For particularly difficult pieces, I met with the writers on a bench under a tree — a rare species of oak, I believe — that grew in front of the administration building. A leaf from that tree still hangs above my desk. When I left this otherwise most remarkable job, I was given a silver necklace of eucalyptus leaves commemorating "the allegedly diseased and dangerous trees" that had been felled for another parking lot.

The protest covered in the local media is by no means a pale imitation of remote actions to save rain forests. There is precedent: in 1971, a two-day protest in Stockholm saved thirteen elms that were to be taken down for subway construction. These still bear the scars of the demonstration, and now commemorate the first act of civil disobedience in Swedish history, an action which forced the government to take into account popular opinion — and defer to it.

As I understand it, the proposed removal of the trees is part of an enormous re-development program of the Memorial. The budget for this project left me, like many, gasping and questioning priorities: I now reside overseas in a country where homeless veterans regularly panhandle at the entrance to the superhighway less than a mile from my home. I assume, as with all AWM gallery development and memorial construction, focus groups concerning the expansion have included past and serving members of the Australian Defence Force. Priorities aside, I wondered why the proposed galleries couldn't be put underground, even under Anzac Parade: I don't recall there being windows in the galleries in the main building, and we were always pressed for wall space. (But please keep the staff in offices with windows: anyone working with text and images needs natural light.)

Arguments have been made for the historicity of these trees; for my part I would argue for their sheer beauty in a mildly manicured space. As is, I always felt that the grounds enhanced the gravitas of the Memorial itself, particularly "at the going down of the sun / and in the morning". Add a few benches, but leave the sculptures in the Sculpture Garden and the memorials on Anzac Parade. Why not let this undeveloped space remain a place where visitors can reflect upon what they have just witnessed, without it being further interpreted for them?

Carla Anne Jaffe

From: Works Approval Consultation

Subject: FW: In defense of the trees - an afterthought

From: Carla Jaffe

Sent: Friday, 30 April 2021 5:58 AM

To: Works Approval Consultation < WAconsultation@nca.gov.au>

Subject: In defense of the trees - an afterthought

Why not have a gallery or a niche in one that addresses what Veterans' Affairs and other parts of the government, as well as the ADF, do for returning armed services personnel?

I am reminded of a paper given at a conference on civil and military co-operation in disrupted states: it concerned the break-up of a medical unit in Rwanda, the PTSD in the members of this unit, and the alarming rise in PTSD among service personnel whose units had been broken up in order to disperse experience / expertise. This destroyed "mateship", another hallmark of Australian defence personnel.

From: Bill Bencke

Sent: Thursday, 8 April 2021 12:00 PM
To: Works Approval Consultation

Subject: Stop the early works for the War Memorial redevelopment

Categories: Orange category, Green category

I am writing as a resident of Canberra to express my opposition to the early works proposed at the War Memorial. I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the ancient eucalypts that surround the area should be prioritised. I also believe the NCA should release a response to all submissions it receives on this issue.

This whole redevelopment needs to be reviewed with consideration of scrapping it completely. This is not what we want for the future of the war memorial.

From: Claire Harris

Sent: Friday, 9 April 2021 9:33 AM
To: Works Approval Consultation
Subject: War Memorial feedback

Categories: Orange category, Green category

I refer to: https://www.nca.gov.au/consultation/block-3-section-39-campbell-australian-war-memorial

I am concerned with the removal of trees in the area and the lack of a statement from the War Memorial on how it has adjusted its design to protect old box-gum trees.

There is also lacking - as far as I can see? - information on how the bushland area will be improved. There is a note in the EIA about weed issues and lacking understorey etc. There is an opportunity here for the AWM to make good and improve the area for native animals, including rare/threatened species such as the Gang Gang cockatoo.

EIA (pg 12) states: "Presence in the study area – Confirmed – ACT16 Zone 1 supports a remnant canopy with greater than 20 mature trees per hectare (i.e. 14 mature trees in 0.27 ha), no regeneration of the overstorey, and a low diversity exotic dominant groundstorey. ACT16 Zone 1 therefore meets the definition of NC Act Box-Gum Woodland in low condition. ACT16 Zone 2 and Zone 3 have been modified to the extent that they now lack the required canopy cover, natural regeneration, native groundstorey, and native understorey diversity to meet the definition of NC Act Box-Gum Woodland. As such, the portions of the study area defined by ACT16 Zone 1 meet the definition of Yellow Box – Blakely's Red Gum Woodland under the NC Act."

I believe the AWM should invest in the natural areas as well - for example with some nature-art installations as well as rehabilitating some of the native bushland. This would also create a fantastic place for visitors to contemplate what they have seen and enjoy nature.

The plans do not outline what the Bean building will be used for and how it will benefit the local community. How will it benefit and contribute to building better lives for serving ADF members, veterans and, importantly, the partners and families of current-serving and ex-serving members?

I would like to see spaces that can be booked by community and social enterprise groups to support the Defence community.

Best regards, Claire From: Deborah Curtis

Sent: Thursday, 8 April 2021 11:58 AM
To: Works Approval Consultation

Subject: Stop the early works for the War Memorial redevelopment

Categories: Orange category, Green category

I am writing as a resident of Victoria to express my opposition to the early works proposed at the War Memorial.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the ancient eucalypts that surround the area should be prioritised.

I also believe the NCA should release a response to all submissions it receives on this issue. Signed

Deborah Curtis

--

From: Jim Colless

Sent: Wednesday, 28 April 2021 4:18 PM
To: Works Approval Consultation

Subject: Knight Frank Town Planning for early works associated with a redevelopment project at

the Australian War Memorial (AWM).

Categories: Green category, Orange category

Members of the NCA,

I write to express my abhorrence of the early works associated with the redevelopment project at the Australian War Memorial. I refer you Tim Hollo's article in "The Canberra Times" today (Wed. 28th April, 2021) entitled "AWM we chose says much of us" which expresses very clearly why this project should not go ahead. I believe this encapsulates the feelings of the majority of Australians.

I trust that you will not allow this dreadful redevelopment to proceed.

Yours sincerely' James Colless From: Jonathan McGuane

Sent: Friday, 30 April 2021 8:00 AM
To: Works Approval Consultation

Subject: Stop the early works for the War Memorial redevelopment

Categories: Green category, Orange category

I am writing as a resident of Canberra to express my opposition to the early works proposed at the War Memorial.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the eucalypts that surround the area should be prioritised.

I also believe the NCA should release a response to all submissions it receives on this issue.

The proposed cost of the redevelopment is nothing short of scandalous, and the redesigned exhibition space risks glorifying war at the expense of the sacred place of reflection on the ultimate sacrifice so many have paid, which the war memorial as it currently stands is.

Most sincerely,

Dr Jonathan McGuane MChD PhD

From: Jenny Osborne

Sent: Thursday, 8 April 2021 9:58 PM
To: Works Approval Consultation

Subject: Stop the early works for the War Memorial redevelopment

Categories: Orange category, Green category

I am writing as a resident of Canberra to express my opposition to the early works proposed at the War Memorial.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the ancient eucalypts that surround the area should be prioritised.

I also believe the NCA should release a response to all submissions it receives on this issue. Jenny Osborne

Sent from my iPhone

From: Gabriela Samcewicz

Sent: Friday, 30 April 2021 2:06 PM
To: Works Approval Consultation

Subject: Against the further expansion of the war memorial

Categories: Green category, Orange category

I am submitting the following comments.

Your site says that consultations have closed but also that submissions can be made until 5pm 30 April 2021. I make this statement in hood faith and on the understanding that it will be considered among the others.

I find the proposal to extend the Memorial into an exhibition of war fighting machinery a distortion of its original purpose. It should not become an advertisement for American, British or French military technology. It should not be supported by the weapons industry, or become a money-making machine to create in Australian youth a morbid curiosity about the latest killing technology. It should not be a carnival of warfare.

Instead, it should continue to be a place of quiet reflection about the folly of war and as a place to honour and grieve for the tens of thousands of young Australians who were drawn into conflicts not of their making, and from which Australia would not necessarily benefit. If we do not remember history, we are bound to repeat it. I remain completely opposed to the unnecessary and extravagant extension of the Memorial, and the war machinery it is proposed will be exhibited in it.

Instead the funds should go to construct a Soave to honour our indigenous men and women who died defending their country during the frontier wars and later.

Gabriela Samcewicz

Wednesday 28th Apr 2021

To whom t may concern,

Comments by The Australian Garden History Society
Community Consultation – Block 3 Section 39 Campbell, ACT
Australian War Memorial – Early Works Approval Application, April 2021

The Austra an Garden H story Soc ety (AGHS) s a nat ona commun ty based organ sat on that promotes awareness and conservat on of s gn f cant gardens and cu tura and scapes.

The Austra an War Memor a (AWM) n Canberra, ocated n a we -treed setting at the base of Mount A ns e, and as part of the Par ament House V sta, s an important cultura and scape with n the central designed and scape of the National Capita. It has been acknowledged as such by inclusion on the National Heritage L st.

It s a so h gh y va ued by the res dents of Canberra, both for ts symbo c ro e as a memor a and as an important and much oved Canberra andmark at the termina of Anzac Parade and at the foot of Mt A ns e.

The AWM n ts ex st ng andscape sett ng has outstand ng mportant aesthet c s gn f cance and the AGHS makes the fo ow ng comments on the proposed redeve opment that w see over 100 trees removed from the s te n order to make way for a new exh b t on ha and a tered front access to the bu d ng.

F rst y and mportant y the process of restructur ng the AWM and ts surrounds shou d be assessed as a comp ete project. The current p ecemea process of approva s s d s ngenuous n meet ng the deve opment a ms of ncreas ng v s tor numbers at the s te rather than reta n ng the s gn f cance of the p ace through conservat on of fabr c, nc ud ng the mmed ate andscaped sett ng. Contrary to c a ms n favour of the deve opment, t s not poss b e to "enhance" her tage s gn f cance. Her tage va ues are present or not, and cannot be manufactured – otherw se any s te cou d be made to become "her tage". Us ng the "enhancement" argument to support the proposed deve opment s spur ous.

A so the documentat on prov ded for effect ve comment s ncomp ete. There are c a ms n the Her tage Impact Statement (HIS) that a andscape arch tect has had nput to the p ann ng, but no report on any andscape her tage assessment s tendered. The HIS report (p25) even adm ts that no nvest gat on (arch va or phys ca) of prev ous andscape work has been undertaken. Best pract ce her tage conservat on requires such a study to proper y nform and m t gate the type of drast c andscape mod f cat ons current y proposed so that her tage values are not adverse y affected.

Has there been any update to the understand ng of the cu tura va ues, espec a y the aesthet c va ues, of the mmed ate and scape sett ng of the AWM s nce the 2011 Her tage Management P an? Sure y such an investigation is crucial to the current approva s process?

The proposed and cape design for redeve opment is a soim significant soil of the proposa is made impossible.

The argument for s gn f cant tree remova s n the documentat on prov ded appears to rest on nsuff c ent study, analys s and assessment of the surrounding and scape and a resultant sting that nadequately protects the and scape. Her tage values can only be protected if they are fully understood and to proceed with the proposal without this knowledge would be to risk destroying or diminishing the National Her tage values of the AWM.

The mmed ate we -p anted sett ng of the AWM s designed to integrate the building with its wider and scape setting of the lower slopes of Mt Ains e as a terminal point of the land axis of the Parl ament House V sta. The vegetation cover sympathetically frames the AWM against Mt Ains e and leads the eye up from the end of Anzac Parade (named Memorial Parade in the heritage sting) with angled tree plantings channeling the view uple theriside of the parade ground to the memorial entrance. The existing pathways eitheriside of the parade ground reinforce this planted and planted design intent.



HEAD OFFICE

Gate Lodge 100 Birdwood Avenue Melbourne 3004

Postal Address c/- PO Box 479 SOMERS VICTORIA 3927

TELEPHONE

info@gardenhistorysociety.org.au

www.gardenhistorysociety.org.au

BRANCHES

ACT/Monaro/Riverina Queensland Southern Highlands South Australia Sydney & Northern NSW Tasmania Victoria Western Australia

Australian Garden History Society (Incorporated in NSW)

ABN 97 291 212 843

The current proposa to remove mature trees and redes gn the parade ground and paths destroys this designed and scape and diminishes the designed and scape values of the place.

The oss of so many trees around the AWM w a so have detrimental effect to the bush setting of the place, and to the wider urban forest of Canberra as if the AWM was not part of a wider local and scape of importance.

The proposa report assesses trees nd v dua y, and on y n natura her tage terms, many whether they are remnant natura y occurr ng spec mens or p anted ones nd genous to the oca ty. This imited assessment over ooks their wider contribution as a *mixed group* planting to the aesthetics of the AWM's immediate surrounding cultural and scape. Not to ment on as wide field habitats and in relation to retent on of trees in the current age of cilinate change.

The proposa to remove over 100 trees at the s te adverse y affects the aesthet c qualt es of the andscape surrounds the building currently rests amongst. It also risks so at ng the AWM from its surrounding bush setting while also removing an important buffer zone to suburb a and encircing roads. Even with part a replacement of new trees (nevitably small sapings by comparison) the precinct bird fe, along with their evocative calls - bird song of magpies and calls of cockatoos; just those sounds that Austral an forces in the overseas theatre of war would have recalled with nostagian—will be reduced for years to come.

In short the designed plantings of the trees surrounding the AWM are part of a designed and scape setting of diverse aesthetic values, and integral to the unique Austra an nature of the spirit of the place and its contemplative memorial function.

The AGHS cons ders that the proposed remova of so many trees at the AWM would conclusively harm the significance of the AWM as a place on the National Heritage ist. The oss of the surrounding native trees, and the birds that visit them in the AWM sidefinitive character and scape, with have an adverse impact in relation to its dentity as the "Australian" national memorial to those failer in conflict.

In the v ew of AGHS the deve opment as proposed should not be approved by the NCA unt an full assessment of the cultura values, especially the aesthetic values, of the immediate and scape setting of the AWM has been undertaken by an independent unbiased consultant and the findings integrated into a project and made public.

Yours s ncere y,

Stuart Read and Bronwyn Bake

Co-Chars

Austra an Garden H story Soc ety

Nat ona Management Comm ttee

From: <u>Lorraine Jenner</u>

To: Works Approval Consultation

Subject: Australian War Memorial destruction

Date: Friday, 30 April 2021 5:02:08 PM

I wish to add my disapproval of the proposed works at the Australian War Memorial.

I am utterly dismayed at the attitude of those promoting this devastation and their misguided opinion that they are either wanted by the public, or necessary. The hell-bent intention to destroy the 116 eucalypt trees is a shameful and ill-considered matter on its own, but then there's the demolition of Anzac Hall also – likewise entirely wrong.

Do we really need to spell out to the proponents of this devastating "upgrade" the importance of the big, beautiful trees?? We don't want the resulting barren area and loss of bird habitat if they are destroyed. To quip that they will be replaced with even more trees is pathetic – who is happy to wait 80 years for a return of the area to its current state?? The unseemly haste with which the powers involved wish to begin this destruction indicates that they know it is not a popular idea.

Anzac Hall is hardly beyond further use. To demolish it rather than utilise it is a disgraceful proposal, especially when there are so many big ideas in abundance.

The overall grandiose proposal and apparent need to present a big, new, shiny, modern and impressive premises is misguided at best, objectionable and offensive in its intent. We the people are not calling for this. We understand that expansion is necessary but please be reasonable – the cost is outrageous and the plan is not warranted. We don't need destruction of the current "feel" and ambience of the grounds or buildings; we need the basics like the Roll of Honour and current great displays, NOT grand architecture and desolate surrounds.

Please revise this abominable proposal, beginning with saving the trees.

Sincerely, Lorraine Jenner. From: <u>Lindsay Miller</u>

To: Works Approval Consultation

Subject: PROPOSED REDEVELOPMENT - AUSTRALIAN WAR MEMORIAL

Date: Friday, 30 April 2021 4:10:57 PM

Dear Sir,

I understand that today is the final day that comments and objections can be lodged regarding the intended redevelopment at the Australian War Memorial (AWM).

I have not personally registered objections regarding public expenditures before - such action has not been my habit. However, this AWM redevelopment proposal has affected me greatly. I speak as a Veteran - having served in the Confrontation between Indonesia and the Commonwealth / Malaysia in 1966, and in Vietnam in 1968/69. I am opposed to the redevelopment! My objections are:

- . The AWM is a very functional national treasure as it is. Its main purpose is to be a Memorial not a receptacle for examples of every major piece of past military hardware. Such purposes should be accommodated elsewhere. The most recent development, only a few years ago, should be the limit for such expansion.
- . The expansion of the AWM to accommodate huge collections of military hardware will divert the Australian peoples' understanding of its purpose from it being a Memorial to it being a Showcase and entertainment venue not the intention of the AWM's initiator, C. E. W. Bean.
- . The apparent need to destroy the trees fronting the AWM is most concerning. They provide a very natural Australian atmosphere for the Memorial, and their loss, in the short term and in the long term, will be too serious to contemplate. No doubt there are intentions to replace them to some extent, but that will be a long, long time away, and probably only partly effective.
- . The funds reported to be spent undertaking the redevelopment, some \$500 million, should be directed to areas of greater need. One obvious area would be support to veterans in need, including rehabilitation, housing and hospitalisation. There are also other areas of national need that deserve funding.

Please consider my objections as being serious. I would welcome termination of the redevelopment proposal.

Lindsay P. Miller

From: <u>Tim Hollo</u>

To: <u>Works Approval Consultation</u>

Subject: Submission regarding War Memorial "Early Works"

Date: Monday, 26 April 2021 11:13:25 AM

Attachments: image.png

To the National Capital Authority,

I write in regards to the NCA's current consultation on the proposed "early works" for the Australian War Memorial (AWM) expansion and redevelopment, calling on you in the strongest possible terms to make use of your particular remit among the institutions of our capital city to halt this development before more damage is done to the heritage and culture of the city.

The NCA's crucial role is to ensure that all development within significant areas of the national capital is consistent with the National Capital Plan. This includes, among other points, ensuring that such development:

- is consistent with Canberra's role "as the symbol of Australian national life and values":
- conserves and enhances "the landscape features which give the National Capital its character and setting, and which contribute to the integration of natural and urban environments"; and
- creates, conserves and enhances "fitting sites, approaches and backdrops for national institutions and ceremonies".

It is not just my opinion, but that of the great majority of Canberrans I have spoken to and heard from, as well as many relevant stakeholders from architects to veterans, that the AWM redevelopment, including the tremendously impactful so-called "early works", is inconsistent with the National Capital Plan. The NCA must uphold the Plan and reject the proposal.

Early Works

The point of an "early works" approvals process is to enable works on a development to begin before approvals processes for the full development are concluded. The assumption embedded in this process is that the early works, if approved, would not make the full development a foregone conclusion. In order for this to be the case, such early works should involve minimal disturbance to the site.

It is impossible to conclude that this is the case with these proposed early works. The destruction of Anzac Hall, the bulldozing of some 160 trees across the entirety of the site, and the massive excavation, effectively ensure that, once early works approval is given, the AWM site will be irrevocably changed - irrevocably damaged in the opinion of many - and the full redevelopment will become a truly foregone conclusion.

On these grounds alone, the NCA should send the proposal back, notifying the developers that only truly "early works" involving minimal site disturbance will be considered at this time.

Symbol of Australian life and values

The AWM was established for a very clear purpose: to serve as a space for

commemorating and memorialising those fallen in wars, and to reflect on war and its impact on Australian society and people. It is very clear, in the AWM's own publications, that it is not to be "a general museum portraying war, much less one glorifying it".

Conceived at Anzac on Gallipoli, born amid the thunder of the guns at Bullecourt in France, the Memorial has been raised by the living members of the Australian forces to their fallen mates. It constitutes not a general museum portraying war, much less one glorifying it, but a memorial conceived, founded and, from first to last, worked for by Australia's soldiers, sailors, and airmen.

As a symbol of Australian life and values, the shift from a space of reflection to a museum expanded so as to showcase military hardware cannot be overstated. If the NCA approves this proposal, you will stand responsible for enabling a symbolic shift in the representation of Australian life and values away from one which sees war as an evil to be avoided towards one which celebrates and glorifies war, with all the destruction that that entails.

As the "early works" are of such scale purely in order to enable the massive expansion for such purposes, and as they involve such disturbance to the site that the full expansion would become a foregone conclusion, it is vital that the NCA reject this proposal at this stage on the grounds of maintaining the national capital as a symbol of national life and values.

"Landscape features" and "fitting sites and backdrops"

It has long been noted and appreciated that Canberra's character is inextricably linked with its position embedded in the bush. From the Parliament House literally under a grassy hill, to the High Court nestled amongst gum trees by the water, to the War Memorial half hidden behind trees at the foot of Mount Ainslie, it is these landscape features, sites and backdrops which give the city and its key sites their precious nature. For the AWM in particular, the site is part of the flow of the bush along the crests of Mount Majura and Mount Ainslie, past the memorial, down Anzac Parade, to the shore of Lake Burley Griffin facing Reconciliation Place and Parliament House.

The removal of so many trees will inevitably disrupt this key landscape feature, making the AWM less of a fitting site or backdrop for important events in our national capital.

Many of the trees proposed to be bulldozed for these early works are more than 60 and 70 years old. Even if the commitment to replace them is held to, it will be close to three full generations before the site returns to something approximating its current state amongst the bush. Two generations of Australians will lose the opportunity to visit the AWM as a site of reflection nestled among the trees.

This is not something the NCA should countenance.

Democratic processes

As a final, vital note, the NCA has a particular responsibility, as guardians of the national capital, to deeply engage with the will and desires of the people of the Canberra community in particular and the broader Australian community at large, as well as the specific views of relevant constituencies.

The AWM has sought to dramatically misrepresent the views of the community through presenting the results of an online survey with an array of leading questions and no option to register overall disapproval of the expansion, as showing overwhelming support. This is

simply not the case.

Opposition has been heard publicly from all quarters, including veterans, architects, historians, former senior staff of the AWM, and concerned members of the public. My experience doorknocking across the Canberra community and asking people about their issues of concern has been that tremendous numbers raise the AWM expansion without prompting, and a great majority of those I speak to oppose it for reasons ranging from wasted resources to environmental disturbance to protecting heritage to disapproval of the change from a space of reflection to a museum showcasing military hardware.

At an absolute minimum, I urge you to pause any approvals process in order to hold truly representative democratic consultation and discover what the actual will of the people is before allowing one of the most important sites you hold stewardship responsibilities for to be irrevocably altered.

With thanks for your consideration, Tim Hollo

TIM HOLLO

Australian Greens Candidate for Canberra

http://greens.org.au/act

?

From: Colin Smeal

To: Works Approval Consultation

Subject: Submission regarding the Australian War Memorial proposed redevelopment

Date: Wednesday, 28 April 2021 3:41:47 PM

I first visited the Australian War Memorial 67 years ago and even than as a 10 year old I was in awe of its beauty and solemn symbolism honouring our servicemen and women.

After moving to Canberra in the early 60's I have visited the Memorial at least once a year and often several time, proudly showing visitors and relatives this beautiful monument.

I am an avid armature military history buff and a member of the ACT Antique and Historical Arms Association so have a keen interest in the hardware of war and the Memorials collection of artefacts. Sadly, in recent times, I have become concerned that the Memorial was being turned in a sort of military fun fair, presumably aimed at entertaining younger generations and keeping it "relevant".

I have visited war memorials and museums around the world but the AWM was always unique, until recent times, when the memorial aspect seems to have been overshadowed by the collection of militaria and the overt advertising in many subtle - and not so subtle - ways by the military industrial manufactures. This is quite disturbing to me and also a number of friends and acquaintances.

I have no argument with the objective of widening the museum aspect to represent more recent conflicts but why could this not be achieved by decentralising the exhibits - particularly the "big things"? Many organisation such as the Imperial War Museums follow this model and do so in a very successful way.

The destruction of parts of the current structure of the AWM, including the Anzac Hall, together with associated works that will see hundreds of trees removed and extensive excavations seems to be totally out of kilter with the raison dêtre of the AWM. I would sincerely urge the Authority to NOT to approve the application (of the somewhat deceptively described) "early works" which, if approved, will clearly open the doors to the full redevelopment of

the Memorial.

Yours sincerely

Colin Smeal

From: Josh Wyndham-Kidd

To: Works Approval Consultation

Subject: Please stop destruction of trees & unnecessary demolition

Date: Tuesday, 20 April 2021 12:05:41 AM

Dear committee members,

Please do not allow the remaining elements of the AWM redevelopment to go ahead.

The current structure is reverent, architecturally recognised and suitable for the bush capital. It sits beautifully in the landscape.

Importantly, please halt the destruction of over 100 beautiful native gums and other trees on the site. These "early works" are an unacceptable price to pay - let alone what they're setting up to do.

Yours, Josh --Josh Wyndham-Kidd From: <u>Carolyn Hughes</u>

To: Works Approval Consultation

Subject: Stop the early works for the War Memorial redevelopment

Date: Thursday, 8 April 2021 12:28:08 PM

Dear sir

I live in and want to express my opposition to the early works proposed at the War Memorial.

Please stop the early works immediately. Any further redevelopment must involve thorough community consultation, and the preservation of the ancient eucalypts that surround the area should be prioritised.

I also request that the NCA release a response to all submissions it receives on this issue.

Yours faithfully. Kelli Hughes

Sent from my iPhone

From: john stace

To: Works Approval Consultation

Subject: "The "early works" application regarding the AWM

Date: Thursday, 1 April 2021 12:08:29 AM

Hello,

Over the past 6 months, I have commented on the proposed \$500million project of modifying and expanding the AWM.

I am concerned that an Early Works application to the National Capital Authority is premature. It is a major project ...and should wait until the NCA appraises there whole project.

Please defer the Early Works request until the the NCA evaluates the entire redevelopment proposal.

John Stace

Retired country doctor

From: <u>David Flannery</u>

To:Works Approval ConsultationSubject:War Memorial RedevelopmentDate:Friday, 9 April 2021 12:16:29 AM

I write to express my opposition to the early works proposed at the War Memorial.

The demolition of ANZAC Hall must not proceed. It is a national architectural treasure.

The retention of the eucalypts that surround the area should also be prioritised.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation.

I also believe the NCA should release a response to all submissions it receives on this issue.

David Flannery FRAIA MPIA

From: Margaret Langford

To: Works Approval Consultation
Subject: Desecration of the War Memorial
Date: Wednesday, 28 April 2021 3:53:49 PM

I wish to oppose the proposed enlargement and alterations of the Australian War Memorial.

I strongly disagree with the destruction of Anzac Hall and the bulldozing of magnificent eucalypts on the site.

The size of the War Memorial is quite adequate at present in its near Canberra city location and could accommodate most histories and details of conflicts by ever changing displays and information. It should be maintained as a memorial to those Australians who have participated in defending conflicts and peacekeeping activities throughout the world. It should not be used as a monument to display weapons of mass destruction which have been largely manufactured by overseas corporations. If a display of massive military hardware is deemed necessary it could be housed at a different venue outside the city area.

The gum trees surrounding the buildings should be kept because they are so evocative and signify a sense of peace and reflection.

Gum trees are the symbols of Australia and remind all Australians of their homeland when at peace or at war.

After all this is the AUSTRALIAN WAR MEMORIAL.

It seems hard to justify an allocation of half a million dollars to an unnecessary expansion of bricks and mortar on an existing War Memorial when services for returned service personnel are so essential and so underfunded.

Some of this money could be better spent also on other worthy cultural institutions in Canberra, eg, National Archives, National Gallery and National Library which truly reflect our true values and national life.

Margaret Langford

From: Jaakko

To: Works Approval Consultation
Subject: Australian War Memorial (AWM)
Date: Thursday, 29 April 2021 12:22:38 PM

Good morning

I am writing with regard to the proposed development at the Australian War Memorial.

I object to this development on the grounds that expanding the Memorial to house military hardware distracts from the objective of honouring the sacrifice of our soldiers. The sacrifices of our troops in more recent campaigns can easily be honoured more economically in the existing space.

I've yet to meet a single person in favour of the proposed development. I hope and trust the democratic voice of Canberrans is respected.

Yours sincerely

Jaakko Tarhala

From:
To: Works Approval Consultation

Subject: Australian War Memorial proposed changes

Date: Friday, 30 April 2021 3:27:58 PM

To whom it may concern:

I only heard on the radio yesterday that you were taking submissions regarding the proposed changes to the Australian War Memorial.

In April 2020 I wrote to the AWM with my thoughts, got a reply from Matt Anderson (who I had heard interviewed), and my views haven't changed.

Then I said 'My family and I were appalled when we heard, when Brendan Nelson was still in charge, that you plan to spend up to half a billion dollars on the place. Not only do we think this is unnecessary and a wicked waste of the country's limited resources, though supplemented by armaments' companies, we think there are many projects on which the money could be better spent. We're always being told money is tight. We have around 100,000 homeless people – the money could be used to build houses for them for starters, and on other worthwhile projects which both state and federal governments have reduced or cancelled money from.

I do not agree that 'Australians will think it is money well spent' – I don't and I'm sure many other citizens would agree. It's big enough, it doesn't need expansion or re-building. The last time I went to the AWM was about 50 years ago. I thought it was a depressing place, and though I've been to Canberra since I had no desire to go there again.'

Today (30.4.2021), having read the information on your NCA website regarding the fact that the federal government has approved the planned changes, and Abrahams heritage impact statement, I wish to have my opinion as in my 2020 letter noted by you. I would add that demolishing a building only 17 years old is a terrible waste of an asset, and no trees should be removed, as the chap interviewed on the ABC yesterday said is proposed (dozens of 80 year old ones). We lost more than enough trees in the recent fires, we don't need more deliberately cut down to satisfy someone's ego. The whole proposal is an unnecessary disaster and should be dropped. The money should go to the National Archives which need it far more than the AWM does.

Yours,

From: Richard Rand

To: Works Approval Consultation
Subject: War Memorial proposal

Date: Thursday, 29 April 2021 7:32:10 PM

This proposal is a narcissistic obscenity.

We do not need the destruction of an outstanding landscape and an award winning building to glorify war and satisfy the ego of bureaucrats and a few military officers past and present.

To spend \$500m on this project is a perverse allocation of limited public resources that could be far better spent on veterans' welfare and other far more important issues.

This project is a betrayal of the Australian community.

Rick Rand

Sent from my iPhone

CANBERRA ORNITHOLOGISTS GROUP PO Box 301, Civic Square ACT 2608

cogoffice@canberrabirds.com.au
www.canberrabirds.com.au



WAconsultation@nca.gov.au

Australian War Memorial re-development (Block 3/Section 39 Campbell) – National Capital Authority works approvals

The Canberra Ornithologists Group (COG) wishes to provide comments in response to the invitation for public input on this phase of the AWM re-development. The key area of concern to COG is the loss of a large number of eucalypt habitat trees used by various species of birds, as well as by other biodiversity.

The Canberra Ornithologists Group (COG) is a volunteer-based community group with around 400 members, with a mission that includes the conservation of native birds and their habitats. COG plays an active role in advocating for the protection of native vegetation as bird habitat, and for the mitigation of threats to and impacts on native birds.

COG is aware that the AWM re-development has been controversial in the community, with significant concerns raised, including some opposition to the re-development. COG also understands that the statutory environmental processes have been approved by the Commonwealth. However, in COG's view the significant cumulative impacts of the phased work program on the biodiversity values of the site have not been adequately addressed.

The AWM re-development site abuts, and is contiguous with, a large and important area of natural vegetation in the ACT reserve system, namely Mt Ainslie Nature Reserve and Mt Majura Nature Reserve. This woodland and dry forest is part of an identified natural wildlife corridor which extends from the Hall area at the north-east boundary of the ACT and includes the Mulligans Flat Nature Reserve and Woodland Sanctuary, as recognised in the AWM ecological report and assessment from Capital Ecology. It includes important areas of high-quality lowland grassy woodlands (Yellow Box/Red Gum), an endangered ecological community recognised in the ACT Native Woodland Conservation Strategy 2019, which supports habitat for eight bird species listed as threatened under the ACT *Nature Conservation Act 2014*, as well as several bird species also listed under the Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) and other rare or uncommon woodland birds. These birds require large, well connected woodland patches.

Of particular note is the occurrence of Swift Parrot (*Lathamus discolor*) in the Mt Ainslie/Mt Majura reserve complex. This species is listed as 'Endangered' under the EPBC Act and as a threatened species in each state and territory in which it occurs (NSW, Tasmania, Victoria, ACT, Queensland and South Australia).

Swift Parrot occur regularly in the woodlands of Mt. Ainslie/Mt Majura during autumn, winter and spring on their annual movements through mainland Australia. They commonly forage in large eucalypt trees on the lower wooded slopes. This area is regarded as one of the important ACT woodland habitats and foraging sites for the species:

- since 2004, Swift Parrot have been recorded in this area in around half of the years, with a maximum of 67 birds in March/April 2005, and some years numbers of 15-25 birds
- in the last few weeks, in April 2021, Swift Parrot have been recorded in this area, with up to 15 birds observed to date
- there are also records of Swift Parrots foraging in eucalypts in suburban gardens that directly abut these reserves, in the suburbs of Hackett and Ainslie.

The large, mature eucalypts on the AWM site are examples of the foraging sources used by these endangered parrots, providing resources such as lerps and other insects, flower buds and nectar. The National Recovery Plan for the Swift Parrot, published by the Commonwealth, identifies loss of habitat as a key threat, and considers it important to protect and manage a broad range of habitats to provide a range of foraging resources¹. This gives a sound argument for retention of the mature eucalypts on the AWM site, an issue that does not seem to have been adequately addressed in the AWMs environmental studies.

COG understands from the AWM documentation that removal of a large number of mature trees is proposed for the AWM re-development. It is not clear how many of the total number of the mature trees of all species assessed on the site will be removed, but appears to include 63 mature planted native trees and 6 naturally occurring mature eucalypts. Both the natural and planted eucalypt species would provide foraging resources for Swift Parrot. The loss of such a large number of trees in the geographical context of an important neighbouring reserve/wildlife corridor that provides habitat for an endangered bird is very concerning. COG therefore argues that the eucalypt vegetation contiguous with the reserve area should be retained. While the potentially impacted area is not large at a landscape scale, planning and development processes that take a site-by-site approach ignore cumulative impacts on bird habitats at the broader landscape scale.

COG is particularly concerned about any loss of the endangered woodland community identified on the AWM re-development site (however small that occurrence may be). We understand from the ecological report/assessment that fourteen (14) naturally occurring, mature eucalypt trees (Yellow Box and Apple Box) have been identified as having significant ecological values, but not all of these are proposed to be retained or protected. It is COG's view that ALL these mature eucalypts should be retained. The ACT Government has listed

2

¹ <u>environment.gov.au/biodiversity/threatened/recovery-plans/national-recovery-plan-swift-parrot-lathamus-discolor</u>

the loss of such trees as a threatening ecological process, and is developing an Action Plan to better protect these keystone natural resources.

COG recommends that the NCA review the proposed AWM work on the site as a whole, in order to minimise the cumulative losses of mature eucalypts, both the naturally occurring eucalypts (which should all be retained) and the individual planted eucalypts that have values for biodiversity.

COG can be contacted on cogoffice@canberrabirds.org.au.

Yours sincerely



Canberra Ornithologists Group

27 April 2021

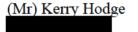
From: Kerry Hodge

To: Works Approval Consultation
Subject: AWM Redevelopment.

Date: Friday, 30 April 2021 1:48:56 PM

Totally opposed to the current proposal.

When you do approve the proposal, please rename the institution the Australian War Museum because that is what it will be.



From: Richard Kemmis

To: Works Approval Consultation

Subject: Stop the early works for the War Memorial redevelopment

Date: Friday, 30 April 2021 2:36:57 PM

I am writing as a resident of Canberra for 59 years to express my opposition to the early works proposed at the War Memorial.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the eucalypts that surround the area should be prioritised.

The memorial will become a museum instead, not its original purpose

I also believe the NCA should release a response to all submissions it receives on this issue.

Regards Richard Kemmis From: <u>Isabelle Gurney</u>

To: Works Approval Consultation

Subject: RE: War memorial Opposition

Date: Tuesday, 13 April 2021 10:19:55 AM

To whom it may concern,

I am writing as a resident of Canberra to express my opposition to the early works proposed at the War Memorial.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the eucalypts that surround the area should be prioritised.

I also believe the NCA should release a response to all submissions it receives on this issue.

Kind regards,

Isabelle

Isabelle Gurney

Gender Equality & Social Inclusion Adviser

Pacific Women Shaping Pacific Development (Pacific Women) Support Unit

From: Info

To: Works Approval Consultation

Subject: FW: HPE CM: Please do not cut down the trees at the War Memorial [SEC=OFFICIAL]

Date: Thursday, 29 April 2021 9:02:27 AM



----Original Message-----

From: Julie Fox

Sent: Thursday, 29 April 2021 6:57 AM

To: Info <info@nca.gov.au>

Subject: HPE CM: Please do not cut down the trees at the War Memorial

I wish you would not demolish the modernist building at the War Memorial but certainly please do not remove the 100 or so mature eucalyptus trees.

Yours faithfully

Julie Fox

Sent from my iPhone

From: <u>Darcy Molyneux</u>

To: Works Approval Consultation

Subject: Stop the early works for the War Memorial redevelopment

Date: Thursday, 8 April 2021 12:42:35 PM

To whom it may concern,

I am writing as a resident of Canberra to express my opposition to the early works proposed at the War Memorial.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the ancient eucalypts that surround the area should be prioritised.

Regards

Darcy

From: <u>Carolyn Holbrook</u>

To: Works Approval Consultation
Subject: Comment on "early works"

Date: Monday, 22 March 2021 11:09:56 AM

Attachments: image001.png image003.png

Thank you for the opportunity to comment.

I am highly opposed to the demolition of Anzac Hall, the felling of dozens of developed gum trees and the massive excavation that will take place under the banner of 'early works'. Anzac Hall is one of the most revered and significant aspects of the Australian War Memorial and I urge the proponents of this massively expensive project to reconsider its demolition and to down-scale this redevelopment. The AWM is beautiful as it is and all these changes are taking it further and further from what Charles Bean envisaged. Yours sincerely, Carolyn Holbrook







--



From:
To: Works Approval Consultation

Subject: The extension of the Australian War Memorial

Date: Monday, 26 April 2021 2:24:46 PM

Why? Why spend so much money destroying a National Monument when the money could be spent on a new and exciting National Museum in another (to be iconic) area?

The AWM is acknowledged as a well-loved, well used Memorial to our Service-people ,living and dead. Why desecrate it?

I suspect an area in the North of Canberra, visible from Northbourne Ave. or the Federal Hwy. would be much more suitable and would pull the focus away from central Canberra and into the expanding north.

The Govt. seems ready to "pipe its eye" over our Glorious Dead once a year and then actively desecrate its Memorial the day after.

So, leave the AWM as it is, just leave it alone.

Sincerely, P.S. Dickson

From: Lois Verrall

To: Works Approval Consultation

Subject: AWM

Date: Wednesday, 28 April 2021 2:45:02 PM

I am emailing you in regards to destroying the present war memorial, and replacing it with huge weaponry show case that dose not symbol of Australian life and values.

Very concerned citizen Lois Verrall

Sent from my iPhone



Community Consultation – Block 3 Section 39 Campbell Australian War Memorial – Early Works Approval Application

This submission is made on behalf of Professional Historians Australia (PHA), which represents over 500 professionally accredited historians across all Australian states and territories. Many members work in heritage positions that aim to preserve both the natural and cultural heritage of Australia. They therefore take a strong interest in significant cultural landscapes. The Australian War Memorial (AWM) is one of the most significant and is acknowledged as such by its inclusion on the National Heritage List.

Summary

The plantings of the trees surrounding the AWM are part of a designed landscape setting. These trees are integral to the unique Australian nature of the spirit of the place and its contemplative memorial function. To remove them risks the place of the AWM on the National Heritage List.

Issues

PHA is most concerned that the proposal to remove significant trees in the AWM grounds rests on insufficient study, analysis and assessment of the surrounding landscape. Heritage values can only be protected if they are fully understood. To proceed with the proposal without this knowledge would be to risk destroying or diminishing the national heritage values of the AWM.

The immediate, well-planted setting of the AWM was designed to integrate the building with its wider landscape setting on the lower slopes of Mt Ainslie as a terminal point of the land axis of the Parliament House vista. This will be destroyed if over 100 trees are removed from the site in order to make way for a new exhibition hall and altered front access to the building.

PHA understands that the National Capital Authority (NCA) is not considering the wider redevelopment plans, but we still wish to reiterate our strong opposition to that plan, which is a misdirection of half a billion dollars and undermines the AWM's original purpose 'to commemorate the sacrifice of those Australians who have died in war or on operational service'. Moreover, it is vital that the process of restructuring the AWM and its surrounds be assessed as a complete project.

According to the Heritage Impact Statement (p. 25), no investigation (archival or physical) of previous landscape work has been undertaken. Best practice heritage conservation requires such a study to properly inform and mitigate the type of drastic landscape modifications currently proposed. Without this, it is not possible to ensure that heritage values are not adversely affected. The proposed landscape design for redevelopment is also missing from the documentation.

The current proposal to remove mature trees and redesign the parade ground and paths diminishes the designed landscape values of the AWM. The proposal overlooks the contribution of these trees as a mixed group planting to the immediate surrounding cultural landscape and as wildlife habitats. Even with partial replacement of new trees (inevitably small saplings by comparison) the precinct's birdlife will be reduced for years to come.

PHA urges the NCA not to approve this proposal.



From: <u>Judith</u>

To: Works Approval Consultation

Subject: Stop the early works for the War Memorial redevelopment

Date: Monday, 12 April 2021 6:21:40 PM

I am writing as a resident of Canberra to express my opposition to the early works proposed at the War Memorial.

I believe that the early works should be immediately stopped, that any further redevelopment must involve thorough community consultation, and the preservation of the ancient eucalypts that surround the area should be prioritised.

I also believe the NCA should release a response to all submissions it receives on this issue.

This War Memorial expansion is a terrible and massively expensive project.

Sent from Mail for Windows 10

From: <u>Julie Lindner</u>

To: Works Approval Consultation

Subject: Development of War Memorial

Date: Wednesday, 5 May 2021 2:08:41 PM

Dear Sir/Madam

I object to the proposed expansion of the War Memorial. Stop kowtowing to the war industrialists who cause death and destruction to keep themselves in luxury never ever considering taking part in war but happy to send anyone else! The fact that Politicians and the WM board accept gifts and money from them is obscene.

The destruction of trees both planted and natural to extend the WM is destroying living things to substitute them with inanimate objects of destruction. Where do your priorities lie? Think of all the trees, birds, animals and insects, living things, you will destroy in your march to display a few bits of hardware.

Shame of the Board of the WM the politicians who proposed this development. Nature is worth much more than silent shiny objects that will be on display so please NCA do something worthwhile and reject this development.

I don't hold out much hope based on what you have done to destroy Canberra as the Nation's Capital!

Julie LIndner

From: <u>mary napier</u>

To: Works Approval Consultation
Subject: NCA CONSULTATIONS

Date: Friday, 30 April 2021 12:25:07 PM

I object to the way the Development process happened at AWM. They planned and held consultations for the Development Which were poorly advertised, poorly designed and consultations were poorly attended. The audience has not been representative.-

The questionnaires asked questions so they got answers AWM wanted. They were not designed to get people to consider implications of knocking down Anzac Hall and altering the visual impact on The Vista of Anzac Parade.or cutting down 160 trees.

If I had not lived in Canberra it's unlikely I would have known to this day that AWM development was planned. Interstate people haven't received coverage on tv, radio or papers. It hasn't been advertised widely enough in Canberra. It's a big life changing issue for soldiers and their families and friends.

A Member of my community association attended the briefing at Griffin centre 29th April. His community association is fighting to save trees. He knew about AWM plan to destroy Anzac Hall and 100 trees. His community association is trying to save 400 trees.

ANZAC HALL is planned for demolition. It's 20 years old. It won the Gold medal architects award, was in the process of planning to become heritage listed in its own right. Its the one part of AWM people can easily understand. Against heritage advice from the government's own heritage advisor Dr kemp, Dr Nelson, the AWM council, possibly arms manufacturers the government has agreed to knock it down.

I've heard from the planners that the front of AWM Is to be enlarged so more bus loads of kids can get in and out, to increase visitation. It's hard to get them in and out on existing stairs.

Who is to say parents Will want their kids to go to AWM if it is turned from a memorial into a museum for fl11, tanks, Chinook etc. Kids will want to go because of the big kit, but ask them a year later what they saw and they just recall the thrill of it all. War is getting very unpopular.

They, AWM, would be advised to get their history straight before they spend half a billion to house questionable stories

I Ask the NCA consider extending the date for submissions for at least a month, explain the issues more broadly and advertise that they are asking for comment.

Dm Napier.

Sent from Yahoo Mail on Android

From: <u>mary napier</u>

To: <u>Works Approval Consultation</u>

Cc: Sally Barnes

Subject: Addition to my submission.

Date: Tuesday, 11 May 2021 10:20:05 PM

I wish to add additional AWM questions to my submission lodged just before closure of submissions..

Did AWM adverise intention to demolish Anzac Hall in public notices in Newspapers all over Australia? If so when? If not, how was the public meant to know the demolition and development were planned?

How were we meant to be able to imagine the extent of the change in the nature of the war memorial? That it was to become into a vast space, not for theraputic mileau as Dr Nelson often suggested but for corporate funtions space decorated with armaments.

Was the public asked in public notices in newspapers if the development was necessary. If so when.

Why put a f111 in AWM when it was never used in defense of Australia.

Isnt the War memorial's purpose to remember people who served in combat?

Has the war memorial considered parents might not want their children to be taken in busloads to AWM in the future?

Why isnt the history of the wars sorted out before a house is built for it?

Why add more screen?

DId NCA advertise in Newspaper public notices, other that it was accepting submissions?. How was the public meant to know NCA was accepting submissions?

Did NCA extend the closure date of submissions requested at the public meeting just before the closure date.?

DM Napier.

Sent from Yahoo Mail on Android

From: Mt Ainslie Weeders

To: Works Approval Consultation
Subject: Australian War Memorial expansion
Date: Wednesday, 28 April 2021 9:49:01 AM

It is disappointing that the public is being invited to comment only on "early works". How can "early works" be separated from the project in general? Already many trees have been removed and a large area concreted over, never to be planted again.

This important institution is a "memorial", not a "museum". A memorial does not need more galleries showcasing military hardware funded by weapons manufacturers, who are also political donors. A war museum should be a completely separate institution and could well be situated in a regional area to attract visitors and boost a regional economy.

What is wrong with retaining the look and the heritage of the AWM, nestled at the foot of Mt Ainslie, surrounded by native trees? What is wrong with continuing to commemorate the awfulness of war and the losses experienced by our young country?



From: Mt Ainslie Weeders

To: Works Approval Consultation

Subject: Submission re the NCA Approval Early Works Package

Date: Wednesday, 28 April 2021 11:59:35 AM

To whom it may concern,

The Mt Ainslie Parkcare Group wishes to express its concerns regarding the 'Early Works' proposal for the Australian War Memorial (AWM).

1. Demolition of Anzac Hall

Buildings on their own have little significance. They acquire cultural significance over time. Their heritage value grows as more and more visitors experience the buildings and appreciate the stories contained within their walls. The demolition of such a highly esteemed building negates its architectural value and the cultural significance it has built up over time.

2. Removal of Trees

The existing trees currently slated for demolition place the AWM in its context, nestling into the slopes of Mt Ainslie. This is further enhanced by the continuous eucalyptus plantings running the length of Anzac Parade and aligning the Memorial with both old and new parliament houses. This is consistent with our heritage as the bush capital and that natural effect will not be replicated for many decades to come by regimental plantings of immature trees.

3. Major excavations and reconstruction works at the front of the AWM.

The current entrance has a quiet dignity, simplicity and reverence which prepares the visitor for the coming experience. This will be lost to most people if it is not seen as the main entrance. It will significantly affect the heritage value of the precinct.

Finally, the Mt Ainslie Parkcare Group is of the opinion that approval of these 'early works', if granted, is tantamount to final approval for the whole project.

Is it possible to conceive a situation where the 'early works' are approved but the final works are not given the go-ahead? If not, either the logic or integrity of the NCA's approval processes must be questioned.

Thank you for considering our submission.

Mt Ainslie Parkcare Group

From: Anna Lee

To: Works Approval Consultation
Subject: RE:War Memorial

Date: Friday, 30 April 2021 7:38:38 PM

Attachments: image.png

To the NCA Master Jokers of an organisation. Especially according to the brilliant Paul Costigan in

Canberra City News:

Slippery, Tricky NCA Fails The People Of Canberra

https://citynews.com.au/2021/slippery-tricky-nca-fails-the-people-of-canberra/

And this:

A City Cries Out For Proper Master Planning

https://citynews.com.au/2020/a-city-cries-out-for-proper-master-planning/

And this also:

WHY WON'T THIS TONE DEAF GOVERNMENT LISTEN TO PEOPLE?

https://citynews.com.au/2020/why-wont-this-deaf-government-listen-to-people/

And from The Canberra Times

CANBERRA RISKS LOSING ITS CHARACTER ALTOGETHER: FORMER PLANNING HEAD TONY POWELL

https://www.canberratimes.com.au/story/6032991/canberra-risks-losing-its-character-altogether-former-planning-head-tony-powell/digital-subscription/

A meeting at The Griffin Centre last night described how you corrupt allowed the WM development to proceed. And how proper process was NEVER followed. Only the will of those moneyed imbeciles Nelson and Stokes seemed to matter.

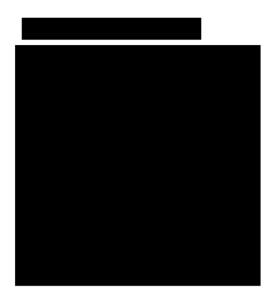
A brilliant summation of why that development will be a complete disaster was mentioned a week ago on ABC RN's Late Night Live:

Strength Of Australia's Historical Anti-war Sentiment

https://www.abc.net.au/radionational/programs/latenightlive/strength-of-australias-anti-war-sentiment/13313650

A great campaign is about to commence





Anna Lee