

## **Statement of Reasons for decision to approve Early Works associated with the AWM Redevelopment - Block 3 Section 39 Campbell**

I, Andrew Smith, being an employee of the National Capital Authority (NCA) and holding delegation from the Authority to approve works under section 12(1)(b) of the *Australian Capital Territory (Planning and Land Management) Act 1988* (the PALM Act), provide the following statement of reasons for my decision to approve the early works (consisting of hoarding, service relocation, demolition and excavation) associated with the Australian War Memorial (AWM) redevelopment within Block 3 Section 39 Campbell (the Early Works).

This statement is provided in response to requests made pursuant to section 13 of the *Administrative Decisions (Judicial Review) Act 1977*. This statement sets out the background, my findings of facts, a reference to the evidence or other material on which my findings were based and the reasons for my decision. In providing this statement of reasons it is not accepted that any requester is entitled to a statement of reasons pursuant to section 13 of the *Administrative Decisions (Judicial Review) Act 1977*.

### **LEGISLATION**

Sections 10, 11 and 12 of the PALM Act are relevant to the consideration of the application for works approval. Section 10 outlines the matters covered by the National Capital Plan (the Plan) and provides as follows:

- (1) The Plan may specify areas of land that have the special characteristics of the National Capital to be Designated Areas.*

Section 11(2) requires that the Authority not do any act that is inconsistent with the Plan.

Section 12 of the PALM Act provides as follows:

- (1) No works shall be performed in a Designated Area unless:*
  - (a) the proposal to perform the works has been submitted to the Authority together with such plans and specifications as are required by the Authority;*
  - (b) the Authority has approved the works in writing; and*
  - (c) the works are in accordance with the Plan.*

The subject site is located within a Designated Area under the Plan. Works approval under section 12 was therefore required before any works could be undertaken.

### **BACKGROUND**

The process for consideration of works approval generally includes a number of steps. These are:

- Pre-lodgement discussions on preliminary drawings
- Pre-lodgement design presentations
- Application submitted by the applicant.

- NCA may request further information on the application.
- Public Consultation on the proposed works (as described the NCA's Commitment to Community Engagement).
- NCA may request further information as a result of submissions received during consultation.
- NCA delegate makes a determination on the application against the provisions of the Plan.
- The applicant and submitters are advised of the decision.

#### **APPLICATION FOR WORKS APPROVAL WA102272**

The AWM is a nationally significant memorial containing a shrine, museum and archive. It is listed on the Commonwealth and National Heritage lists under the *Environment Protection and Biodiversity Conservation Act 1999*.

On 12 March 2021, an application for works approval was received by the NCA from Knight Frank Town Planning. The application is for early works associated with a broader AWM Redevelopment located at Block 3 Section 39 Campbell. The applicant states the AWM Redevelopment will address the following matters:

- Spatial constraints that prevent:
  - the telling of the stories of recent conflicts and operations at a level of detail consistent with earlier conflicts, and
  - the AWM properly recognising the service of those who served in recent conflicts and operations;
- The lack of capacity to include large technology objects such as planes, helicopters and armoured vehicles within galleries, as these objects are critical to telling the stories of recent conflicts and operations;
- Circulation challenges caused by the numbers of visitors being well in excess of what the building was designed for, and which has now been in excess of one million per year for the last five years; and
- The lack of compliance with the *Disability Discrimination Act 1992*, to ensure the facility is accessible for everyone, regardless of physical capacity.

The current application is concerned only with the proposed early works, as described below. Any further works in the proposed the AWM Redevelopment will be subject to separate future applications for works approval.

#### **THE SITE**

The subject site (Block 3 Section 39 Campbell) is Unleased National Land located within a Designated Area (Figure 70 - Constitution Avenue and Anzac Parade). The site is located at 20 Treloar Crescent, Campbell and bounded by Limestone Avenue, Fairbairn Avenue and Treloar Crescent. The permitted land use for the site within the National Capital Plan is National Capital Use.

The AWM is listed on the National and Commonwealth Heritage lists under the *Environment Protection and Biodiversity Conservation Act 1999* and is also included in the Register of the National Estate.

The works within each package are:

- **Early Works Package 1:**

- **Project Perimeter Hoardings** to the Southern Entrance, Bean Building and Anzac Hall Works Sites. The hoardings will ensure staff, visitors and the public are separated from the work sites.
  - Main Southern Hoarding: Installation of a 6-metre height x 52m width hoarding to be installed along the southern perimeter and be visible from Anzac Parade. In pre-WA discussions between the AWM and NCA it was agreed the hoardings along with Southern perimeter will be plain cream mesh cover with a section of graphics that features an artist's impression of the future Southern Entrance.
  - Bean Building, Anzac Hall work sites: to include H1 and H2 hoarding design: this contains a blue background with graphics, the maximum length of graphics is 30m and is separated by 30m length plain blue (the hoarding design is identical to that approved already by the NCA as part of various enabling works applications).
- **Southern Entrance Site Early Works:**
  - Installation of tree protection measures (in accordance with *AS4970:2009 Protection of Trees on Development Sites*) for the trees adjacent to the works area.
  - Demolition of forecourt planters.
  - Level 1 plant room and vents to be de-commissioned.
  - Eastern Precinct carpark plant room to be demolished.
  - Pedestrian ramp to carpark to be demolished. Batter to carpark edge in accordance with Civil Engineer's detail.
  - Demolition of bitumen road and footpaths.
  - Removal of Parade Ground gravel and turf.
  - Demolition of existing pathways.
  - Removal of all metalwork, including handrails, balustrades and bollards.
  - Existing flood lights are to be retained and protected.
- **Stonework Removal**
  - Removal of Main Entry stair and plinths stonework (to be stored for re-instatement).
  - Removal of the stonework to the existing heritage retaining wall (north-west of the forecourt, to be stored for reinstatement).
  - Removal of Christmas Bush granite paving / sandstone paving / Parade Ground sandstone retaining walls (to be stored for re-use).
  - Any Stonework dismantling is to be undertaken by a heritage masonry specialist consultant. This will ensure quality control measures are implemented (e.g. accurate identification, cataloguing, tagging, handling, storage, repair, and re-laying methods).
- **Services Relocation**
  - Works associated with services relocations, redirections and upgrades are to be undertaken in accordance with the Civil Engineer's drawings and specifications.



- **Civil Works and Bulk Excavation**
  - Works associated with bulk excavation, including battering, and shoring to civil and structural engineer's details.
  - Local re-grading to proposed pathways and Parade Ground terraces.
  - Installation of Central Energy Plant services culvert.
  - Installation of the north and south services culverts on East Road.
  - Installation of a new roundabout at the Poppy's Carpark entry road.
  - TCCS Authorisation of Temporary Traffic Management (TM/8026) will be in place along Limestone Avenue and Fairbairn Avenue.
- **Early Works Package 2: Services Relocation and Ancillary Works**
  - Services capping to Anzac Hall to enable demolition.
  - Service relocations from Treloar Crescent.
  - Service relocations from Bean Building and Poppy's Café.
  - Service relocations to the New Southern Entrance.
  - New Bean Building timber workshop entry and path to enable staff access during construction.
- **Early Works Package 3: Demolition of Anzac Hall**
  - Installation of 2.1m height solid project hoardings around the site including graphics.
  - Demolition of Anzac Hall building.
  - Demolition of Link Bridge connecting to the Main Building.
  - Demolition of embedded structure and services.
  - Demolition of hardstand and stairs.
  - Removal of 11 trees along southern verge of Treloar Crescent.
  - All relocations of existing external services adjacent to Anzac Hall will be completed to allow excavation works to be undertaken.
  - Soil Nail Walls (SNW) to be constructed around the full perimeter of the Anzac Hall Lower Gallery, matching the extent of the bulk earthworks excavation documented by TTW Civil. Soil Nail lengths vary between 3.0m and 11.0m and wall thickness is typically 150mm.
  - Sections of the SNW are designed to cantilever above existing ground level to allow for the retention of proposed landscaping and will be formed up above ground.
  - Demolition works will not impact on the Main Building. The Brisbane Bridge and Gun will be protected while works are underway.
- **Early Works Package 4: Civil Works and Bulk Excavation**
  - New Southern Entrance sandstone and granite removal for storage and reuse.
  - New Southern Entrance and Parade Ground excavation.
  - East Road north and south culverts.
  - Anzac Hall bulk excavation and soil nails.
  - Bean Building Extension and Central Energy Plant bulk excavation.
  - Minor demolition works of existing precast walls and moat.
  - Central Energy Plant culvert installation.

#### **Bean Building Early Works**

- Installation of a site perimeter hoarding containing graphics enclosing the works area of the Bean Building.
- Underground water mains, gas lines, sewer lines, fire services, chillers and high and low voltage conduits will be relocated to enable bulk excavation.
- Relocation of chillers servicing Bean Building and Poppy's Café.



- Removal of concrete retaining walls and footings, the moat wall, the timber workshop entry, and the path from the stair and loading apron slab.
- A new opening will be created in the outer northern precast concrete wall in the location of a future door.
- Parts of the landscape surrounding the Bean Building: including part of the northern carpark, fences, trees, pavement, pathways, and steps will be removed.
- Bulk excavation will include the excavation of culverts north of the Bean Building to facilitate the construction of the Central Energy Plan.
- Soil-nail walls will be constructed inside the excavated areas to facilitate future construction of foundations and to provide structural containment for the excavated walls.
- Installation of a north and a south services culvert in East Road.
- A portion of East Road will be removed to allow for the installation of culverts and a temporary road surface will be established prior to the permanent reinstatement (to form part of the Main Works Package). The temporary surface will facilitate the movement of heavy construction vehicles for the duration of the project without damaging hardstand, verges, and other ground infrastructure.
- No floor area is to be demolished at the Bean Building.

### **Prior NCA and external approvals**

In making my decision, I have had regard to the following approvals made prior to the application made to the NCA:

#### Previous NCA works approvals

I have had regard to previous NCA approvals of associated enabling works for the AWM Redevelopment. Relevantly, the NCA has previously approved several 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. A list of previous approved works associated with the AWM Redevelopment is attached at **Attachment A**.

#### Environment Protection and Biodiversity Conservation Approval

Part 2.4.4 (a) of the National Capital Plan states that the National Capital Authority will consider heritage places in Designated Areas for purposes of protecting the environment in a manner currently afforded under the *Environment Protection and Biodiversity Conservation Act (1999)* (EPBC Act) and any subsequent legislation.

In November 2019, the AWM referred the proposal to the Department of Agriculture, Water and the Environment (DAWE) for its assessment under the provisions of the EPBC Act. On 10 December 2020, the Minister for the Environment approved the proposal with conditions.

Minister Leys' assessment and approval of the proposal (as subsequently varied by the Department of Agriculture, Water and the Environment) considered and addressed all relevant heritage matters.

### Parliamentary Standing Committee on Public Works

The Parliamentary Standing Committee on Public Works assessed the Redevelopment project and on 22 February 2021, the Committee recommended that the House of Representatives resolve that it is expedient to carry out the Australian War Memorial Development Project, pursuant to s 18(7) of the *Public Works Committee Act 1969*.

This adoption of the recommendation by Parliament appears in the House of Representatives Hansard on Thursday, 25 February 2021.

### MATERIAL CONSIDERED

In making my decision on the works approval application for the proposed early works associated with the AWM Redevelopment, including hoardings, service relocation, demolition and excavation at Block 3 Section 39 Campbell, I had regard to:

1. the National Capital Plan and the relevant provisions therein;
2. the material submitted with the works approval application, including reports and design iterations submitted by the applicant (Knight Frank Town Planning, on behalf of the AWM);
3. the submissions received during consultation and the Consultation Report dated June 2021 prepared by the NCA;
4. the Delegate Report prepared by qualified planning officers;
5. the Parliament House Vista Heritage Management Plan (2010);
6. the Australian War Memorial Heritage Management Plan (2011);
7. the Australian War Memorial Site Development Plan (2016);
8. the previous NCA approvals and external approvals;
9. advice provided by the ACT Government (Transport Canberra and City Services) regarding Temporary Traffic Management;
10. a Tree Management Plan & Tree Protection Measures prepared by Canopy Tree Experts dated 4 March 2021 which covers 16 trees (outlined in **Attachment B**);
11. the advice provided by the arborist (Canopy Tree Experts) dated 26 May 2021 (further outlined in **Attachment B**);
12. the Ecological Impact Assessment prepared by Capital Ecology dated 5 March 2021;
13. the Environment Protection and Biodiversity Conservation Approval decision made by the Minister for the Environment dated 10 December 2020; and
14. Variation of Conditions of EPBC approval (EPBC 2019/8579) dated 27 May 2021.

### FINDINGS OF FACT

#### **Planning Considerations (National Capital Plan)**

##### Land Use

The proposed works are located within Urban Areas as shown in *Figure 2: General Policy Plan – Metropolitan Canberra*, of the NCP and the Constitution Avenue and Anzac Parade Precinct of the Central National Area.

The land use policy for this site is **National Capital Use**. Appendix A 'Land Use Definitions' of the National Capital Plan defines the term '**National Capital Use**' as:

*“The use of any land, building or structure for the purpose of a work of special status and national interest. This includes the National Library, the National Gallery, the High Court, the National Archives, the National Museum of Australia, the Australian War Memorial, the Prime Minister’s Residence, the Governor-General’s Residence, the Australian National University, the Australian National Botanic Gardens, Commonwealth Offices needing prestigious locations, national memorials, National Association Offices as herein defined, a hospitality house or a Commonwealth Government conference centre and the like.”*

(Emphasis added).

As such, the proposed works will not alter the land use policy for the site. I find that the proposed works are not inconsistent with the Plan’s land use policy for the site.

### **Assessment of Works**

I set out in the tables below my findings of fact relevant to my assessment that the proposed works are in accordance with the Plan and my decision to grants works approval.

### **Part 2.2 Productivity (Infrastructure and Employment)**

*Ensure that infrastructure supports the development of Canberra’s National Capital functions.*

<b>Principles for Objective One</b>	<b>Assessment</b>
<i>a) Infrastructure must support the effective functioning of Canberra with proper consideration of the environmental and visual impact and be integrated with land use decisions.</i>	<p>Not inconsistent with the Plan.</p> <p>The proposed Early Works comprise installation of temporary project perimeter hoardings, service relocation and civil works, demolition of Anzac Hall, tree removal and bulk excavation.</p> <p>The Early Works are associated with the broader Redevelopment of the AWM (to be subject to a separate works application).</p> <p>The demolition of Anzac Hall will have a visual impact during construction. The major redevelopment is to include a new building within the footprint of Anzac Hall. This will be subject to a separate works application.</p> <p>The proposed removal of 140 mature trees will have a visual impact in the short term. The impacts of the tree removal will be mitigated over time by the proposed new tree planting (a minimum of 250 new trees are to be planted) forming part of the Public Domain works (subject to a future works application in April 2021).</p> <p>The DAWE assessed the proposed works in accordance with the EPBC Act and on 10 December 2020, the Minister for the Environment approved the proposal with conditions.</p>



<p><i>b) Infrastructure must be planned and provided in an integrated and timely manner to facilitate the development of Canberra and the Territory and ensure safety and security of supply and operation.</i></p>	<p>Not inconsistent with the Plan.</p> <p>I find that that the application for early works is planned and will be provided in an integrated and timely manner.</p>
<p><i>c) Energy and water supply and security issues will be given due consideration in the planning and development of any new infrastructure.</i></p>	<p>Not inconsistent with the Plan.</p>
<p><i>d) The infrastructure of Canberra and the Territory must be planned and provided to:</i></p> <ul style="list-style-type: none"> <li><i>• ensure that public utilities infrastructure is available and maintained for Commonwealth and ACT Government needs and activities.</i></li> <li><i>• minimise the visual impact of electricity and telecommunication facilities, particularly along major vistas, corridors and major open space.</i></li> <li><i>• give due consideration to energy and water, supply and security issues.</i></li> <li><i>• ensure safety and security of supply and operation.</i></li> </ul>	<p>Not inconsistent with the Plan.</p> <p>Services relocation (including gas relocation works, stormwater diversions, high cable relocation behind Anzac Hall) forms part of the Early Works application and is required to facilitate the future major redevelopment works.</p> <p>In order to facilitate the relocation of services, 11 trees along the southern verge of Treloar Crescent are required to be removed.</p> <p>The Early Works, including the relocation of services, will not impact on the availability of public utilities, nor will any visual impacts of electricity and telecommunication facilities occur as a result of the works. Any visual impacts arising from the carrying out of the works will be minimised by the use of hoardings, where possible. There is no intended impacts to energy or water, supply and security issues during the Early Works phase.</p>
<p><b>Principles for Objective Two</b></p>	<p><b>Assessment</b></p>
<p><i>a) The location of employment in Canberra and the Territory should enhance rather than detract from the city's role as the National Capital.</i></p> <p><i>b) Major employment generating land uses will be located within Defined Activity Centres. Major employment location proposals must be determined with regard to their transportation and environmental impacts.</i></p>	<p>Not inconsistent with the Plan.</p> <p>The applicant advised that the Redevelopment Project will generate a large number of construction jobs over the next 9-10 years. During the operation phase there will be 418 additional direct and indirect jobs created.</p> <p>The AWM Redevelopment, and the Early Works, will generate employment. However, the finished project will not result in the AWM becoming a major employment generating land use area.</p> <p>I consider the construction jobs generated by the project will enhance the city's role as the National Capital, rather than detract from it.</p>

## Part 2.3 Sustainability (Environmental Sustainability and Open Space)

*Objective one – Ensure the development of a city that both respects environmental values and reflects national concerns with the sustainability of Australia's urban areas.*

*Objective two - Protect the nationally significant open-space network, visual backdrop and landscape setting of the National Capital.*

Principles for Objective One	Assessment
<i>a) Urban expansion should be contained so as to minimise impacts on valuable natural and rural areas.</i>	<p>Not inconsistent with the Plan.</p> <p>The AWM is located within 'Urban Areas' under Figure 2 of the General Policy Plan. The Early Works are contained within the AWM Precinct and the southern verge of Treloar Crescent.</p> <p>The construction footprint is confined to three main areas within the AWM Precinct (Anzac Hall, Bean Building and Southern Parade Grounds). This approach will minimise impacts on the landscape character of the AWM.</p> <p>I have taken into account the fact that the demolition of Anzac Hall and the removal of 140 trees will have a visual impact within the medium term while works are undertaken and trees mature. However, I find this impact will diminish as the works are completed and the planted trees reach maturity.</p>
<i>b) A substantial portion of new development must be located within existing urban areas such as town centres and along public transport routes or other strategic sites that allow for efficient use of infrastructure.</i>	<p>Not inconsistent with the Plan.</p> <p>The works are confined to the AWM Precinct. Relocation of utility services along with co-location of services in some locations will ensure the efficient use of utility infrastructure.</p>
<i>c) The natural environment of Canberra and the Territory will be protected and improved by reducing resource consumption and waste, improving water security and quality, energy and food security and improving and protecting soil quality.</i>	<p>Not inconsistent with the Plan.</p> <p>The Early Works are contained within the AWM Precinct which is already a highly modified landscape. Impacts on the environment will be managed in accordance with the Construction Environmental Management Plan. I consider that with appropriate mitigation measures, the works are unlikely to impact on the natural environment of Canberra and the Territory.</p>
<i>d) Ecological communities, threatened flora and fauna species, water catchments and water quality will be protected and supported by sustainable resource management.</i>	<p>Not inconsistent the Plan.</p> <p>An Ecological Impact Assessment was prepared by Capital Ecology (dated 5 March 2021). The Ecological Impact Assessment examined ecological values for the study area, review of threatened ecological communities, plant community type mapping and</p>

	<p>tree survey. The Ecological Impact Assessment states:</p> <p><i>"No Significant Plants and Animals are mapped within the study area of the ACT Government's ACTmapi online mapping tool." However, there are threatened species and potential threatened woodland areas in proximity of the AWM.</i></p> <p><i>The study area contains one plant community type namely 'ACT 16 – Eucalyptus melliodora – Eucalyptus blakelyi Tableland Grass Woodland.</i></p> <p><i>The study area has been used as the site for the Australian War Memorial since the early 1940's. As a result, the vegetation which occurs today is highly modified. The majority of the study area has been cleared, intensively landscape and regularly mown over a long period of time. The remnant overstorey is largely absent and the native midstorey and shrub storey have been entirely removed. The ground storey is heavily modified and dominated by a variety of exotic lawn grasses and common weeds. The few native non-grass species present in the study area are primarily non-local native species of various provenance, all of which have been planted for landscaping purposes.</i></p> <p><i>Given that the study area is currently a manicured landscape and is heavily frequented by the public, it is unlikely that it constitutes a significant component of a wildlife movement corridor or is otherwise of high importance for fauna habitat connectivity. This is evident as the majority of the study area is not identified as a 'Local Link' or as possessing 'Regional Linkage Value' on ACTmapi.</i></p> <p><i>Of the 154 trees assessed, only five contain a functional hollow and therefore support a potential nesting / roosting habitat resource to hollow-dependant fauna."</i></p> <p>The AWM advised that excavated material will be temporarily stored off-site for reuse.</p> <p>Construction and material laydown areas are to be sited in existing cleared areas and not within existing vegetated areas.</p> <p>Taking into account the above, I find that the Early Works adequately protects and supports any ecological communities, threatened flora and fauna species, water catchments and water quality, where applicable.</p>
e) Development will respect environmental values including water catchments and water quality and ensure resilience to the impacts of climate change.	Not inconsistent with the Plan.



	<p>Erosion and sediment control plans for the Early Works contain measures that will be in place to minimise impacts on the hydrological catchment. These measures include installation of siltation fences, geotextile fabric around stormwater pits, sandbag sediment trap, hay bale barriers and turf lined swales.</p> <p>There are no natural watercourses with the Project site. A man-made drainage channel runs from the north – western corner of the site to the south-eastern corner, approximately 40m north of the Project site. There is very low potential for disturbed earth to wash into the drainage channel as it is located uphill from the Project site.</p> <p>Having regard to the above, I find the Early Works will respect environmental values.</p>
<b>Principles for Objective Two</b>	<b>Assessment</b>
<i>a) The hills, ridges and other major open space will be kept largely free of urban development and will act as a natural backdrop to the National Capital.</i>	<p>Not inconsistent with the Plan.</p> <p>The works are contained within the AWM Precinct and are not expected to impact on the hills, ridges and other major open space.</p>

## Part 2.4 Liveability (Urban Design and Heritage)

### Objective One – Urban Design and Heritage

*Enhance and preserve Canberra's symbolic and unique design and role as the National Capital.*

*Objective Two - Enhance the character of Canberra and the Territory as the National Capital by identifying, protecting, conserving and presenting natural, Indigenous and historic heritage places.*

<b>Principles for Objective One</b>	<b>Assessment</b>
<i>a) The National Capital role requires that planning and development, in Canberra Central in particular, and generally throughout the Territory, should reflect contemporary thinking in urban design practice.</i>	<p>Not inconsistent with the Plan.</p> <p>The Early Works application comprises installation of temporary project perimeter hoardings, service relocation and civil works, demolition of Anzac Hall, tree removal and bulk excavation.</p> <p>Taking into account the above and the materials in the application, I find the Early Works will adopt and reflect contemporary thinking in urban design practice.</p>
<i>b) Planning controls should seek to ensure that development in all forms, including landscaping in urban and non-urban areas, complements and enriches its surroundings.</i>	<p>Not inconsistent with the Plan.</p> <p>The demolition of Anzac Hall and the removal of 140 trees will have a visual impact in the short term.</p>

	<p>The current application does not include new landscaping. The applicant has submitted a Tree Removal and Replacement Plan which includes proposed planting of at least 250 native trees. The proposed tree planting will form part of a separate works application for the public realm areas to be submitted to the NCA in April 2022 (tree planting would occur after the Early Works phase of the AWM Redevelopment).</p> <p>Consistency will be achieved once the new tree planting is established.</p> <p>The EPBC approval requires that the landscape plan is prepared with the input of a heritage landscape architect and that a 'Heritage Impact Assessment' is carried out and approved by the DAWE.</p>
<p><i>c) 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.</i></p>	<p>Not inconsistent with the Plan.</p> <p>The proposed bulk excavation is confined to specific areas within the AWM Precinct. This includes excavation for the New Southern Entrance and Southern Parade Ground and the Bean Building extension.</p> <p>No new buildings are proposed in the current works application and therefore it is not necessary to consider whether the application includes substantial works of architecture, engineering and landscape as it relates to the overall composition, symbolism and dignity of the National Capital. In coming to this conclusion, I have had regard to the proposed demolition of buildings within the AWM precinct.</p>
<p><i>d) Development in the National Capital should seek to achieve harmony between architecture and landscape to give continuing effect to the City Beautiful and Garden City characters of the city.</i></p>	<p>Not inconsistent with the Plan.</p> <p>This application is for early works associated with the AWM Redevelopment.</p> <p>Details on architectural design of the new building and extensions along with landscaping will form part of separate works approval applications. Any further applications will be assessed independently, however it is not necessary to consider harmony between architecture and landscape for this application.</p>
<p><i>e) Within Canberra Central, roads, bridges, waterways and public landscaping projects should reinforce and complement the geometric lines of the Main Avenues.</i></p>	<p>The AWM Redevelopment is not within Canberra Central and therefore, this principle is not applicable to my consideration of whether the Early Works are not inconsistent with the Plan.</p>

<i>f) Vistas to major landscape features must be protected from and enhanced by development.</i>	<p>Not inconsistent with the Plan.</p> <p>The demolition works to the Southern Parade ground will be shielded from public view by installation of temporary perimeter hoardings with graphics illustrating the final appearance of the AWM.</p> <p>I find that the vista to the AWM will be protected from the development while the development is taking place, and will not be impacted once the AWM Redevelopment project is finalised.</p>
<i>g) Buildings in Canberra Central should be of a height generally not greater than the height of the mature tree canopy (typically 3-4 storeys), except where otherwise permitted by the Plan. In Canberra Central no building or structure which protrudes substantially above the tree canopy must exceed a height of RL617.</i>	<p>This principle is not applicable to my consideration of whether the Early Works are not inconsistent with the Plan.</p>
<i>h) Opportunities should be encouraged for the enhancement and reinforcement of the physical, symbolic, and visual linkages to adjoining areas of the Inner Hills and the Central National Area.</i>	<p>Not inconsistent with the Plan.</p> <p>The Early Works are contained within the AWM Precinct and are unlikely to impact on the symbolic and visual linkages of the Inner Hills.</p>
<i>i) Urban development will be planned in a manner which promotes community vitality and safety, applies the principles of crime prevention through environmental design and recognises the needs of people with disabilities.</i>	<p>The Early Works application comprises installation of temporary project perimeter hoardings, service relocation and civil works, demolition of Anzac Hall, tree removal and bulk excavation. I find that promotion of community vitality and safety, and crime prevention are not applicable to the Early Works.</p>
<p><i>j) New development, including public spaces, should:</i></p> <ul style="list-style-type: none"> <li><i>• exemplify sustainability principles</i></li> <li><i>• demonstrate excellence in urban design, landscape and architecture</i></li> <li><i>• facilitate pedestrian connectivity and bicycle movements where appropriate</i></li> <li><i>• encourage energy efficient development and land use.</i></li> </ul>	<p>Not inconsistent with the Plan.</p> <p>The Early Works application comprises installation of temporary project perimeter hoardings, service relocation and civil works, demolition of Anzac Hall, tree removal and bulk excavation.</p> <p>Further development proposals as part of the AWM Redevelopment project will be considered independently as part of further applications.</p>
<b>Principles for Objective Two</b>	<b>Assessment</b>
<i>a) The National Capital Authority will consider heritage places in Designated Areas as Commonwealth Areas for the purposes of protecting the environment in the manner currently afforded under the Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act) and any subsequent legislation.</i>	<p>Not inconsistent with the Plan.</p> <p>The proposed Early Works comprise installation of temporary project perimeter hoardings, service relocation and civil works, demolition of Anzac Hall, tree removal and bulk excavation.</p> <p>In November 2019 the AWM referred the proposal to the Department of Agriculture, Water and the Environment (DAWE) for its assessment under the</p>



	<p>provisions of the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act).</p> <p>The Department of Agriculture, Water and the Environment (DAWE) assessed the proposed works in accordance with the EPBC Act, and on 10 December 2020, the Minister for the Environment, Sussan Ley approved the proposal with conditions.</p> <p>The approval by Minister Ley satisfies the heritage conditions of the Plan and has guided my assessment of this application.</p>
<p><i>b) Within Designated Areas, the National Capital Authority may require Heritage (or Conservation) Management Plans to accompany development applications for heritage places which should be prepared to meet requirements equivalent to those in the EPBC Act. The National Capital Authority may require Heritage Impact Statements to accompany development applications for a heritage place.</i></p>	<p>Not inconsistent with the Plan.</p> <p>In concluding that the Early Works meets the requirements equivalent to those in the EPBC Act, I took into account the Heritage Impact Statement (HIS), prepared by Hector Abrahams Architect (dated September 2020) which was submitted with the application for Early Works. The HIS is silent on the proposed tree removal and impacts on the landscape. In relation to the demolition of Anzac Hall the HIS concludes:</p> <p><i>"The loss of the existing ANZAC Hall is a sole significant loss of value and has a substantial negative impact on the heritage significance of the place..."</i></p> <p><i>"The demolition of Anzac Hall is the most detrimental aspect of the proposal, representing the loss of fabric of aesthetic significance."</i></p> <p>In relation to demolition of the rear plant enclosure, the HIS concludes:</p> <p><i>"The demolition of the plant enclosure at the rear of the site, including part of its wall, removes an intrusive element from the site. This will improve the appreciation of the symmetrical original main building from the east at the rear, and will remove the noise generated by the plant, which at present as the effect of disturbs the contemplative character of external space in the Eastern Precinct."</i></p> <p>In relation to the broader demolition works, the HIS concludes:</p> <p><i>"Demolition is required for the development to proceed."</i></p>
<p><i>c) Development should be consistent with the requirements of any relevant Heritage (or</i></p>	<p>Not inconsistent with the Plan.</p>

Conservation) Management Plan for that particular place.	<p>In concluding the Early Works are not inconsistent with this principle, I have considered the HIS prepared by Hector Abrahams concludes, in relation to the proposed southern entrance:</p> <p><i>"The bulk of the addition is to be located underground. The primary impact is to small amounts of fabric to allow the insertion of stairways and lifts (this fabric has a high tolerance for change as identified in the 2011 CMP) and to the visual presentation of the building as viewed from the land axis."</i></p> <p>I have also considered other conservation policies related to the Early Works, which are discussed further below.</p> <p>I find the approval by Minister Ley satisfies the heritage conditions of the Plan and guided the NCA's assessment of this matter.</p>
<p>d) The management of heritage places should ensure that their use and presentation is consistent with their heritage values. Heritage places will be presented and interpreted to increase public awareness, understanding and enjoyment of the natural and cultural heritage of the National Capital and its conservation, subject to any reasonable requirements for privacy or confidentiality.</p> <p>e) The National Capital Authority will adopt the Australian Natural Heritage Charter and the Burra Charter as key guiding documents respectively for natural and cultural heritage places within Designated Areas.</p>	<p>Not inconsistent with the Plan.</p> <p>The Department of Agriculture, Water and the Environment (DAWE) assessed the proposed works in accordance with the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act), and on 10 December 2020, the Minister for the Environment, Sussan Ley approved the proposal with conditions.</p> <p>The approval by Minister Ley satisfies the heritage conditions of the Plan and guided the NCA's assessment of this matter.</p>

## Part 2.5 Accessibility

### Objective One – Transport and Movement

*Support a connected and equitable multi-modal transport system.*

Principles for Transport and Movement	Assessment
a) Accessible movement systems for a diversity of pedestrian, cycle, public transport and private transport modes will be provided, with good connections between different modes of transport.	<p>Not inconsistent with the Plan.</p> <p>The Early Works are not expected to impact on accessible movement systems.</p>
<p>b) An accessible movement system will be achieved by:</p> <ul style="list-style-type: none"> <li>supporting efficient and sustainable pedestrian, bicycle and public transport systems that reduce car dependency</li> </ul>	<p>Not inconsistent with the Plan.</p> <p>The Early Works are entirely within the AWM boundary.</p>

<ul style="list-style-type: none"> <li>• <i>maintaining movement around the city for a diversity of pedestrian, cycle, public transport and private transport modes</i></li> <li>• <i>providing streets that foster a connected and pedestrian-friendly environment</i></li> <li>• <i>reducing the barriers created by major roads to make it easier for people to access the public spaces of the city, particularly in the Central National Area.</i></li> </ul>	<p>Temporary traffic management (TM/8026) will be in place along Fairbairn Avenue and Limestone Avenue for the duration of works.</p> <p>Contractor parking (115 car spaces) will be provided on site within the designated temporary carpark above Poppy's Carpark.</p>
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### **Part 3.3 – Urban Areas**

The AWM is located within Urban Areas under Figure 2 – General Policy Plan. The land use for the AWM is 'National Capital Use'. National Capital Use is a permitted land use in Urban Areas.

### **Part 4.1 – The Central National Area**

The Constitution Avenue and Anzac Parade Precinct is located within the Central National Area.

#### **Part 4.1.1 General policies for the Central National Area**

*(1) Protect the Griffins' vision by:*

*(c) "recognising that some elements (for example the Australian War Memorial and Parliament House) are successful reinterpretations of the 1918 Griffin Plan which are consistent with and strengthen the framework and spirit of the Plan."*

*2) Building on the Griffins' vision by:*

*(j) maintaining a mix of tree species which enriches the landscape by providing beauty, shade, shelter and wildlife habitats and enhances the built environment."*

The removal of 140 trees in the current application would appear inconsistent with 4.1(2)(j) in the medium term. The AWM has provided a Tree Removal and Replacement Plan that demonstrates replacement tree planting is intended as part of the Public Realm works application. A total of 246 native trees are proposed. The proposed future tree planting will offset the impacts of the tree removal contained in the current application and there will be no inconsistency once the proposed future tree plantings reach maturity. In advising the AWM of my works approval decision I have made clear that the future application for works approval for future tree plantings is expected to cover a minimum of 250 native trees of specified advanced stock. Any future works approval can ensure advanced stock specified tree plantings appropriate to the site consistent with 4.1(2)(j).

### **Part 4.8 – Constitution Avenue and Anzac Parade Precinct Code**

The Constitution Avenue and Anzac Parade Precinct comprises the land between Constitution Avenue and Parkes Way, the Russell apex of the National Triangle, Anzac Parade and the Australian War Memorial. Anzac Parade is set along the Land Axis, which forms a key feature of the Griffins' original 1912 plan of the city. The Australian War Memorial stands at the top end of Anzac Parade. The two together are central to the commemoration of Australian military service and sacrifice.



Key objectives of the Precinct Code include: developing a built environment which demonstrates design excellence and environmentally sustainable development. The relevant detailed conditions of planning, design and development contained in Part 4.8.5 are included in the table below.

Relevant Detailed Conditions	Assessment
<p>fl. Integrate perimeter security, if required, with streetscape elements that enhance the public domain.</p>	<p>Not inconsistent with the Plan.</p> <p>Temporary project perimeter hoardings are to be installed. The hoardings will ensure staff, visitors and the public are separated from the work sites. The design of the project hoardings is consistent with hoardings already approved by the NCA as part of the enabling works applications.</p> <p>The main Southern Hoarding will be installed along the southern perimeter and be visible from Anzac Parade. The hoardings will be confined to a plain cream mesh cover with a section of graphics that features an artist's impression of the future Southern Entrance.</p> <p>The hoardings proposed for the Bean Building and Anzac Hall will contain graphics and a blue background.</p> <p>The hoardings will ensure staff, visitors and the public are separated from the construction sites.</p>
<p>n. Design proposals should be site responsive, taking maximum advantage of varying characteristics and features of each site, complementing adjoining development – both existing and proposed – and expressing physical and environmental features.</p>	<p>Not inconsistent with the Plan.</p> <p>The current application relates to civil works and bulk excavation associated with the future Redevelopment of the AWM.</p> <p>The works zones are confined to the Southern Parade Ground, Anzac Hall and the Bean Building.</p> <p>The major works will be subject to a separate application.</p>
<p><b>Water sensitive urban design:</b> Implement water sensitive urban design strategies, including bio-filtration systems integrated with street and landscape design, to protect lake water quality. To protect the water quality of Lake Burley Griffin, a catchment management approach should be implemented to detain and filter stormwater in the upper catchment or at the source.</p>	<p>Not inconsistent with the Plan.</p> <p>Erosion and sediment control measures will be in place for the duration of works thereby mitigating impacts on the hydrological catchment. These measures include installation of siltation fences, geotextile fabric surrounding stormwater pits, sandbag sediment traps, hay bale barriers and turf lined swales.</p>

### Other Considerations

As part of making my decision, I have also taken into account other considerations relevant to the Early Works.

The Australian War Memorial is listed on the Commonwealth and National Heritage lists under the *Environment Protection and Biodiversity Conservation Act 1999*.

### The Australian War Memorial Heritage Management Plan 2011

The Australian War Memorial Heritage Management Plan (HMP) was prepared by Godden Mackay Logan in 2011. The HMP provides a guide for conserving, managing, and interpreting the Australian War Memorial's site heritage. The following policies apply to the proposal:

Conservation Policies	Response
<i>Policy 1.1 Conserve, manage and interpret the heritage values of the landscape of the Western Precinct.</i> <i>1.1.4 Conserve and manage the exotic and native plantings of the Western Precinct with an emphasis on the exotic plantings.</i>	Impacts in the short term.  140 trees are proposed for removal across the AWM Precinct as part of the Early Works application. This includes a small number of trees within the (Western) Parade Ground to facilitate the upgrade to the Southern Entrance.  New tree planting is proposed (as indicated on the Tree Removal and Replacement Plan submitted with the Early Works application) to replace the trees being removed and this will be subject to a separate works application.
<i>Policy 1.1 Conserve, manage and interpret the heritage values of the landscape of the Eastern Precinct.</i> <i>1.1.4 Retain the natural native vegetated character of the Eastern Precinct.</i>	Impacts in the short term.  A number of trees are proposed to be removed in in the Eastern Precinct to facilitate the Bean Building extension. Significant new tree planting is proposed within the Eastern Precinct as indicated on the Tree Removal and Replacement Plan submitted with the Early Works application. Further detail on proposed tree planting will be subject to a separate works application.

#### Parliament House Vista Heritage Management Plan 2010

The proposed works are located within the Parliament House Vista, a place included on the Commonwealth Heritage List. The relevant conservation policies are included in the Table below.

Conservation Policy	Response
<i>Policy 16 General conservation provisions for the landscape 16.1 The NCA will discuss with the Australian War Memorial opportunities to strengthen the evergreen framework plantings (i.e. evergreen trees, either native or exotic) in the western area to the side of the Australian War Memorial building to achieve a better overall landscape balance for the Parliament House Vista.</i>	The proposed tree removal, particular in the Southern Parade Ground will have an impact on the Vista in the short term. New tree planting is proposed as indicated on the Tree Removal and Replacement Plan submitted with the application. Further details on proposed tree species will be submitted as part of the Public Realm works application.

#### Australian War Memorial Site Development Plan 2016

The Australian War Memorial Site Development Plan was prepared by Johnson Pilton Walker. The Site Development Plan covers key principles including: site context, Precincts (Main Memorial Building, Eastern Precinct, Western Precinct and Parade Ground), Landscape, Circulation, Security, Future Building Development Sites, Memorial Placement Principles, Lighting, Signage and Furniture.

The relevant Site Development Principles are included below:

##### Future Building Development

-Extension to the existing Bean Building

##### -South-Western Landscape Development

*Numerous existing trees in the south-western site area have been assessed as approaching senescence or with undesirable conditions such as merged crowns. The long term nature of tree growth means that a detailed long term strategy for managing a gradual process of new plantings and removals of appropriate trees should be developed within a framework of the broader strategy for the landscape and placement of memorials.*

##### -Western Precinct

###### *Planting strategy*

*A detailed Tree Assessment Report (DBS, 2007) is used for the management of the existing trees. Numerous trees have been identified to be approaching senescence or having other major problems. These may be gradually removed in coordination with plans for future plantings.*

As part of considering the application, I was aware of and have had regard to the Australian War Memorial Site Development Plan 2016. I note that the siting of the buildings was informed by the site development principles contained within this plan.



## Public consultation

As part of making my decision, I have taken into account the responses received by the AWM during its consultation processes and responses received by the NCA during its consultation processes.

### AWM Pre-Application Consultation

Prior to lodging the Early Works application with the NCA, the AWM undertook two separate consultation processes on the proposed Redevelopment Project.

The first consultation was conducted from November 2019 to January 2020 with a series of 46 face to face / community drop-in sessions, where AWM staff travelled to each state or territory to garner views from interested stakeholders. The consultation was targeted to those with an existing interest in the AWM including veterans, defence families and ex-service groups.

The second consultation in February 2020 was online, with a demographically representative survey specifically targeted at understanding community response to the Redevelopment project on the AWM's social heritage values.

The two consultations resulted in the AWM receiving feedback from more than 1,000 Australians. The Consultation Report was submitted with the application. The Consultation Report concludes:

*"Support for the project was strong across a variety of audience and age groups. Support was consistently above 70% in all States/Territories, with the notable exception of the ACT, and levels of supportive participants were higher than the level of not supportive or neutral participants at 44 of 46 events conducted."*

### NCA Consultation

The NCA's 'Commitment to Community Engagement' details how the NCA conducts consultation. The purpose is to achieve a greater level of consistency and transparency in the NCA's decision making process.

In accordance with the Commitment to Community Engagement, the NCA notifies works applications for 15 business days. Due to the significant national interest in the AWM Early Works, the NCA extended the standard notification timeframe for the AWM Early Works application to 30 business days / six weeks.

Part 2.7 *Works Applications* and Attachment C *Protocol for Development Applications for Works Which Require Consultation* of the NCA's 'Commitment to Community Engagement' describe the consultation process for WA applications. The NCA undertakes an assessment of whether a proposal is consistent with the National Capital Plan and level of public consultation required. An assessment is 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; and
- consistency with an existing Heritage Management Plan.

When an application for works is lodged and public consultation is required, consultation with the community and stakeholders will be undertaken by the applicant, the NCA or both. Where consultation is undertaken by the applicant, the NCA may choose to stipulate specific requirements that the applicant is required to implement.

The NCA may set aside the requirement to undertake full public consultation where:

- previous consultation has been undertaken on the proposal;
- minor amendments to previously approved works are required;
- the NCA determines no stakeholders will be affected; and
- proposals are given exemption, as outlined in Part 2.3 of the 'Commitment to Community Engagement'.

Public consultation was undertaken on this application as it is a mandatory requirement under the National Capital Plan (NCP), and significant community interest has been demonstrated with respect to proposals for the AWM Redevelopment.

Public consultation was undertaken by the NCA between 20 March 2021 and 30 April 2021 in the following manner:

- On Saturday 20 March 2021, publishing a public notice in The Canberra Times outlining the proposed works and inviting submissions to be made to the NCA in relation to the proposal.
- Between 20 March 2021 and 30 April 2021, publishing details of the proposal on the NCA's website.
- Between 20 March 2021 and 30 April 2021, placing two A1 size signs on the site one sign adjacent to the footpath at the Treloar and Limestone Ave intersection (northern AWM) side and one sign adjacent to the footpath at the Treloar and Fairbairn Ave intersection (northern AWM side).
- On 19 March 2021, the NCA wrote to key stakeholders (included on the Works Approval and Strategic Planning Key Stakeholder List) via email advising of the consultation process and inviting comments.

The NCA received 601 submissions on the proposal. The key issues raised in the submissions were:

- Tree Removal and impacts on heritage values.
- Preservation of the Eucalypts should be prioritised.
- Impacts on Heritage Values.
- Demolition of Anzac Hall.
- Cost of Works.

- Concern the Early Works are being considered separately from the Major Redevelopment Works; and
- Concern about the consultation process.

Emails of acknowledgment were sent to submitters advising them that their submission would be taken into consideration before a decision would be made on the application. Issues raised in the submissions and NCA's response to all issues raised are detailed in the Consultation Report published on the NCA's website.

#### Conclusion on public consultation

To the extent that submissions to the Authority raised matters relevant to whether the proposed works are not inconsistent with and are in accordance with the Plan, those matters were considered by me in reaching my findings that the proposed works are not inconsistent with and are in accordance with the Plan, as set in this statement of reasons.

To the extent that submissions raised other matters against approval of the proposed works, I considered that they were not reasons to refuse works approval.

#### **Consideration of Moral Rights**

The application before the NCA includes the demolition of Anzac Hall. Anzac Hall was designed by Denton Corker Marshall Pty Ltd - a Melbourne based architectural practice. On 21 December 2000, amendments to the *Copyright Act 1968* came into effect. These amendments introduced an obligation on the AWM, as a building owner, to consult with the original design architects for Anzac Hall. The NCA sought assurance from the AWM that it has discharged its moral rights obligations under the *Copyright Act 1968* as part of this assessment.

I have considered the assurance received from the AWM and the response of John Denton (by letter dated 18 October 2018). I accept the AWM's assurance that the AWM has discharged its moral rights obligations.

#### **DECISION AND REASONS**

On 4 June 2021, I decided to approve the proposed Early Works.

I assessed the proposed works as being in accordance with the Plan based on the findings of fact as set out above. As I was satisfied that the proposed works were in accordance with the Plan, I considered it appropriate to grant works approval. I considered that the reasons put forward by submitters against works approval that did not relate to whether the proposed works are in accordance with the Plan, were not reasons to refuse works approval.

  
Signed: Andrew Smith

Delegate of the National Capital Authority

Date: 5 July 2021



## Attachment A

### Previous works approvals associated with the AWM Redevelopment

WA Number	Description	Approved Date
WA101543	Installation of Meeting Shed	16/08/2019
WA101546	Installation of Redevelopment Information Centre	30/08/2019
WA101543-A	Installation of Temporary Meeting Shed	17/09/2019
WA101546-A	Installation of Redevelopment Information Centre Amendment	19/09/2019
WA101655	Site Establishment	23/10/2019
WA101656	Fire Hydrant Booster Relocation	23/10/2019
WA101655-A	Site Office Locations and Hoarding Graphics	12/11/2019
WA101573	Poppy's Café Carpark (including temporary parking area for contractors involved in the Redevelopment works)	21/11/2019
WA101847	Relocation of external large technology objects	14/04/2020
WA101925	Temporary pedestrian link, tunnel, and kitchen	4/06/2020
WA101943	Extend carpark façade 15m on existing retaining wall	10/06/2020
WA101939	Temporary workers compound – Southern Entrance	19/06/2020
WA101940	Temporary workers compound – Bean Building	19/06/2020
WA101941	Temporary workers compound – Administration Building	29/06/2020
WA101941-A	Temporary workers compound – Administration Building Amendment	7/07/2020
WA101655-B	Extend WA101655 approval term and fence relocation	13/08/2020
WA102063	Pedestrian access path Poppy Forecourt	29/09/2020
WA102179	Temporary earthing mat, gas meter plinth and gas lines	13/01/2021
WA102189	Enabling works – asbestos removal	14/01/2021
WA102179-A	Temporary earthing mat, gas meter plinth and gas lines - Amendment	22/01/2021
WA102235	Enabling works for the aircraft hall access way	24/02/2021
WA102249	Temporary sheds and fencing	25/02/2021
WA102179-B	Relocate earthing mat and construct pits	26/02/2021
WA102224	Installation of temporary scaffold	31/03/2021
WA102302	Temporary Relocation of HMAS Australia Propeller	12/04/2021

WA102304	Temporary Relocation of Montevideo Sculpture	12/04/2021
WA102305	Temporary Relocation of Simpson and Donkey Sculpture	12/04/2021
WA102297	Enabling Works: Installation of temporary reading room	16/04/2021
WA102240	Temporary relocation of the Stone of Remembrance	4/05/2021

## Attachment B

### Trees Proposed for Removal

Tree Number	Tree Species	Condition /Structure
V591	<i>Eucalyptus melliodora</i>	Good
V590	<i>Eucalyptus melliodora</i>	Good
V111	<i>Eucalyptus bicostata</i>	Good
V65	<i>Eucalyptus bicostata</i>	Good
V64	<i>Eucalyptus bicostata</i>	Good
V63	<i>Eucalyptus polyanthemos</i>	Good
V62	<i>Eucalyptus melliodora</i>	Good
V66	<i>Eucalyptus bicostata</i>	Good
V67	<i>Eucalyptus bicostata</i>	Good
V68	<i>Eucalyptus bicostata</i>	Good
V69	<i>Eucalyptus bicostata</i>	Good
V72	<i>Eucalyptus bicostata</i>	Good
V173	<i>Eucalyptus bicostata</i>	Very Good
V582	<i>Eucalyptus melliodora</i>	Good
V581	<i>Eucalyptus melliodora</i>	Good
V568	<i>Eucalyptus melliodora</i>	Good
V569	<i>Eucalyptus melliodora</i>	Good
V174	<i>Crateagus sp.</i>	Good
V109	<i>Eucalyptus maidenii</i>	Very Good
V108	<i>Eucalyptus maidenii</i>	Very Good
V515	<i>Eucalyptus maidenii</i>	Good/Fair
V516	<i>Eucalyptus maidenii</i>	Good
V517	<i>Eucalyptus elata</i>	Very Good
174	<i>Eucalyptus pauciflora</i>	Poor
V518	<i>Eucalyptus pauciflora</i>	Fair/Good
V522	<i>Eucalyptus pauciflora</i>	Fair/Good
V519	<i>Eucalyptus elata</i>	Very Good
V520	<i>Eucalyptus mannifera</i>	Very Good
V521	<i>Eucalyptus pauciflora</i>	Good
V500	<i>Eucalyptus pauciflora</i>	Good
V499	<i>Eucalyptus pauciflora</i>	Good
V498	<i>Eucalyptus pauciflora</i>	Good
V497	<i>Eucalyptus pauciflora</i>	Good
V504	<i>Eucalyptus elata</i>	Good
V513	<i>Eucalyptus elata</i>	Good/Fair
V512	<i>Eucalyptus mannifera</i>	Good
V511	<i>Eucalyptus pauciflora</i>	Good/Fair
V510	<i>Eucalyptus pauciflora</i>	Good
V509	<i>Eucalyptus pauciflora</i>	Good
V508	<i>Eucalyptus mannifera</i>	Good
V507	<i>Eucalyptus mannifera</i>	Good
V506	<i>Eucalyptus pauciflora</i>	Good
V505	<i>Eucalyptus pauciflora</i>	Fair
V593	<i>Eucalyptus polyanthemos</i>	Good/Fair
V594	<i>Eucalyptus polyanthemos</i>	Good/Fair
V595	<i>Eucalyptus polyanthemos</i>	Good/Poor
V596	<i>Eucalyptus polyanthemos</i>	Good/Fair
V597	<i>Eucalyptus polyanthemos</i>	Good/Poor
V598	<i>Eucalyptus polyanthemos</i>	Good/Poor



V592	<i>Eucalyptus bicostata</i>	Good
V588	<i>Eucalyptus bicostata</i>	Good
V589	<i>Eucalyptus bicostata</i>	Good
V414	<i>Eucalyptus bicostata</i>	Very Good
V650	<i>Eucalyptus melliodora</i>	Good/Fair
V646	<i>Eucalyptus bicostata</i>	Very Poor / Poor
V645	<i>Eucalyptus blakelyi</i>	Very Poor / Poor
V404	<i>Cupressus sempervirens</i> 'Stricta'	Good
V405	<i>Cupressus sempervirens</i> 'Stricta'	Good
V406	<i>Cupressus sempervirens</i> 'Stricta'	Good
V407	<i>Cupressus sempervirens</i> 'Stricta'	Good
V408	<i>Cupressus sempervirens</i> 'Stricta'	Good
V769	<i>Eucalyptus melliodora</i>	Good
V768	<i>Eucalyptus melliodora</i>	Good
V770	<i>Eucalyptus melliodora</i>	Good
V452	<i>Eucalyptus pauciflora</i>	Good
V450	<i>Eucalyptus polyanthemos</i>	Good
V792	<i>Eucalyptus pauciflora</i>	Very Good
V451	<i>Eucalyptus bicostata</i>	Good
V609	<i>Eucalyptus sp.</i>	Good
V610	<i>Eucalyptus sp.</i>	Good
V611	<i>Eucalyptus pauciflora</i>	Good
V612	<i>Eucalyptus pauciflora</i>	Good
V613	<i>Banksia sp.</i>	Fair/Good
V614	<i>Eucalyptus pauciflora</i>	Good
V615	<i>Eucalyptus pauciflora</i>	Good
V453	<i>Eucalyptus blakelyi</i>	Good
V618	<i>Eucalyptus pauciflora</i>	Very Good
V607	<i>Eucalyptus sp.</i>	Very Good
V606	<i>Eucalyptus pauciflora</i>	Good
V599	<i>Eucalyptus pauciflora</i>	Very Good
V600	<i>Eucalyptus pauciflora</i>	Very Good
V601	<i>Eucalyptus polyanthemos</i>	Good / Fair
V602	<i>Eucalyptus polyanthemos</i>	Good / Fair
V603	<i>Eucalyptus polyanthemos</i>	Good / Fair
V638	<i>Eucalyptus polyanthemos</i>	Fair / Good
V636	<i>Eucalyptus melliodora</i>	Fair / Good
V634	<i>Eucalyptus melliodora</i>	Good / Fair
V621	<i>Eucalyptus melliodora</i>	Good / Fair
V620	<i>Eucalyptus melliodora</i>	Good
V622	<i>Eucalyptus cinerea</i>	Good
V635	<i>Eucalyptus melliodora</i>	Good
V639	<i>Eucalyptus bicostata</i>	Good
V640	<i>Eucalyptus melliodora</i>	Good
V641	<i>Eucalyptus camaldulensis</i>	Good / Fair
V743	<i>Eucalyptus melliodora</i>	Good
V744	<i>Acacia decurrens</i>	Poor / Poor
V745	<i>Acacia floribunda</i>	Fair / Good
V117	<i>Eucalyptus melliodora</i>	Good / Fair
V118	<i>Eucalyptus melliodora</i>	Good
V115	<i>Eucalyptus melliodora</i>	Good / Fair
V127	<i>Eucalyptus bicostata</i>	Good
V128	<i>Eucalyptus bicostata</i>	Good
V129	<i>Eucalyptus bicostata</i>	Good

V148	<i>Eucalyptus sp.</i>	Good
V149	<i>Eucalyptus sp.</i>	Good
V150	<i>Eucalyptus sp.</i>	Good
V151	<i>Eucalyptus sp.</i>	Good
V152	<i>Eucalyptus sp.</i>	Good
V116	<i>Eucalyptus melliodora</i>	Good
V643	<i>Eucalyptus sp.</i>	Good
V644	<i>Eucalyptus blakelyi</i>	Good
V647	<i>Melaleuca sp.</i>	Good
V648	<i>Melaleuca sp.</i>	Good
V649	<i>Melaleuca sp.</i>	Good
V398	<i>Eucalyptus sp.</i>	Good
V708	<i>Eucalyptus mannifera</i>	Good
V709	<i>Eucalyptus mannifera</i>	Good
V736	<i>Acacia cultriformis</i>	Good
V737	<i>Eucalyptus sp.</i>	Good
V738	<i>Eucalyptus sp.</i>	Good
V739	<i>Eucalyptus bicostata</i>	Good
V741	Dead Acacias	
V742	Dead Acacias	
V754	<i>Acacia sp.</i>	Good
V755	<i>Eucalyptus mannifera</i>	Good
V756	<i>Eucalyptus mannifera</i>	Good
V637	<i>Eucalyptus sp.</i>	Good
V795	<i>Acacia sp.</i>	Good
V619	<i>Acacia sp.</i>	Good
V608	<i>Eucalyptus bicostata</i>	Good
V790	<i>Eucalyptus sp.</i>	Good
V501	<i>Eucalyptus sp.</i>	Good
V616	<i>Eucalyptus melliodora</i>	Good
V617	<i>Eucalyptus blakelyi</i>	Good
V604	<i>Eucalyptus sp.</i>	Good
V605	<i>Eucalyptus pauciflora</i>	Good
V793	<i>Eucalyptus bicostata</i>	Good
V767	<i>Eucalyptus polyanthemus</i>	Good
V740	<i>Acacia cultriformis</i>	Good
V642	<i>Acacia sp.</i>	Good

#### Trees to be Retained and Protected

Tree Number	Tree Species
V501	<i>Eucalyptus bicostata</i>
169	<i>Eucalyptus elata</i>
170	<i>Eucalyptus pauciflora</i>
189	<i>Eucalyptus pauciflora</i>
190	<i>Eucalyptus pauciflora</i>
191	<i>Eucalyptus pauciflora</i>
192	<i>Quercus sp.</i>
193	<i>Populus deltoides</i>
194	<i>Quercus robur</i>
195	<i>Quercus robur</i>
196	<i>Quercus robur</i>
197	<i>Quercus robur</i>

198	<i>Quercus robur</i>
199	<i>Quercus robur</i>
200	<i>Platanus x acerifolia</i>
201	<i>Platanus x acerifolia</i>