

## Heritage Impact Statement

# Proposed Replacement of Forecourt Poplars at the National Library of Australia

Duncan Marshall AM BArch(Hons) BA MICOMOS  
2021

---

### Executive Summary

The forecourt of the National Library of Australia is part of the originally designed setting for the building, now somewhat modified. The forecourt is part of the Parliament House Vista, being a place on the Commonwealth Heritage List. While the building is also individually on the Commonwealth Heritage List, the boundary does not include the forecourt. None the less, the forecourt is clearly part of the important setting for the Library building.

The Commonwealth Heritage List is maintained under the *Environment Protection and Biodiversity Conservation Act 1999*, and places on the List are afforded protection under the EPBC Act.

The National Capital Authority is proposing to replace the original poplar trees in the forecourt given their poor condition, using another species with many similar qualities. This heritage impact assessment has been prepared to assist the NCA assess and document the impact of the proposal.

Having considered the proposed removal and replacement of the poplars in the National Library of Australia forecourt with an alternate species, it is concluded that the proposed works will:

- have a series of **severe/high or moderate impacts** when considered in the small-scale context of the existing forecourt. Severe/high impacts arise because certain values are tied to the use of poplars as a species. None the less, an effort has been made to select a replacement species which matches as closely as possible the characteristics of the poplars. Moderate impacts arise because the replacement species do not fully achieve the desired qualities of poplars;
- have a series of **moderate impacts** in the larger-scale context of the Parliament House Vista. This relates to the choice of another species for the forecourt. The forecourt plantings are a prominent and reasonably strong element in the vista landscape, and the choice of poplars was linked to the wider use of poplars in the landscape;
- have **no impact** in the case of other values in the smaller and larger-scale contexts;
- be **not consistent or only partly consistent** with a range of relevant conservation policies and strategies, related to the impacts noted above; and
- be otherwise **consistent** with a range of relevant conservation policies and strategies.

The proposed replacement plantings are a highly significant issue for the Parliamentary Zone and Parliament House Vista, as they set a precedent for the future of important poplar plantings in these areas.

It is possible the impacts may be considered a significant impact within the meaning of the

*Environment Protection & Biodiversity Conservation Act 1999* given the:

- scale of impacts – severe/high or moderate in the context of the NLA forecourt or Parliament House Vista;
- general prominence of the plantings – they are the substantial landscape element in the NLA setting and a strong component of the Parliamentary Zone;
- heritage significance of the plantings as part of several heritage places – the NLA and the Parliament House Vista; and
- the precedent to be established for the Parliamentary Zone and Parliament House Vista in replacing poplars with another species.

Therefore an EPBC Act referral under Part 7 of the Act may be required.

A referral is also consistent with Strategy 8.4 in the Parliament House Vista heritage management plan regarding the resolution of conflicts, such as in this case between heritage and broader environment requirements.

It is noted stakeholder consultation is in progress and will include public consultation as part of the NCA works approval process.



## **Introduction**

The forecourt of the National Library of Australia is part of the originally designed setting for the building, now somewhat modified. The forecourt is part of the Parliament House Vista, being a place on the Commonwealth Heritage List. While the building is also individually on the Commonwealth Heritage List, the boundary does not include the forecourt. None the less, the forecourt is clearly part of the important setting for the Library building.

The Commonwealth Heritage List is maintained under the *Environment Protection and Biodiversity Conservation Act 1999*, and places on the List are afforded protection under the EPBC Act.

The National Capital Authority is proposing to replace the original poplar trees in the forecourt given their poor condition, using another species with many similar qualities. This heritage impact assessment has been prepared to assist the NCA understand the impact of the proposal.

This assessment is based on:

- plans for the proposed replacement, and an analysis of possible replacement species, prepared by Cia landscapes + colour;
- the heritage management plan for the Parliament House Vista (Marshall and others 2010);
- a heritage assessment of the poplars (GML Heritage 2017);
- a tree assessment report (Canopy 2017, included as an appendix with the heritage assessment above);
- the Commonwealth Heritage List place record for the Parliament House Vista;
- additional advice from the NCA; and
- a site inspection.

## Summary of Proposal

The proposed works involve:

- removal of the existing poplars as well as all the turf and a depth of soil in the planting area; and
- introduction of new soil, replacement plantings with advanced specimens of *Quercus robur* 'Fastigiata' (Columnar English Oak) trees, installing new irrigation and re-turfing of the planting area.

The replacement trees will be planted at wider spacings in the east-west direction, to provide a more suitable growing environment for the trees. Accordingly, the rows will have fewer trees, while maintaining the overall form of the original design.

The choice of replacement species was the subject of substantial work and consideration. While the normal conservation option would be to replant Lombardy Poplars, these are a prohibited species under the *Pest Plants and Animals Act 2005* (ACT). The legislation allows for permits to propagate, import or supply prohibited pest plants when,

‘The director-general [is]... satisfied that the propagation, importation or supply would not result in the spread of prohibited pest plants of that kind in a way that would endanger the environment or agriculture.’ (Subsection 14(2))

The NCA and its supplier have been unable to obtain the ACT Government’s permission to propagate or import Lombardy Poplars for this project.

In this situation, the NCA considered a range of alternative species noting the significant qualities of the Lombardy Poplar, and the species *Quercus robur* 'Fastigiata' (Columnar English Oak) proved the best option. The qualities of these oaks sympathetic to the conservation objectives for the NLA forecourt are:

- broadly similar form – fastigate form (narrow conical to columnar), rather than columnar – the best columnar form trees will be selected, and the trees will require formative pruning to maintain the desired shape;
- the mature height of the trees should match the existing poplars; and
- their deciduous character.

However, it is noted that the dissimilar qualities include:

- the rate of growth is slow to moderate, noting that over the longer term this quality will not be important;
- the trees are well-suited to the Canberra climate and are longer lived than Lombardy Poplars;
- greenish-yellow to yellowish-brown autumn foliage, rather than yellow; and
- the trees tend to hold dead leaves in winter.

## Heritage Values

The best assessment of heritage values is that provided by the 2017 heritage assessment for the poplars (GML Heritage 2017), reproduced below.

The heritage assessment against the Commonwealth Heritage criteria concludes that the NLA Forecourt and the Lombardy poplars are significant for their contribution to the heritage values of the NLA. The poplars are significant as a species planted during the NCDC period throughout Canberra as designed elements of the landscape. The NLA Forecourt meets criteria a, d, f, and h.

The NLA Forecourt was designed as an integral part of the NLA. It was designed to complement the classical styling of the building and to reflect the designed cultural landscape of Canberra and the Parliamentary Zone.

The attributes of the NLA Forecourt which embody the Commonwealth Heritage values are:

- the horizontal platform;
- rectangular and symmetrical plan;
- the fountain and verticality of the fountain jets;
- the species of Lombardy poplar (*Populus nigra* 'Italica') (not the individual trees);
- the vertical, columnar form, symmetrical layout of the Lombardy poplars and their seasonal colour; and
- east–west axis (perpendicular to the Land Axis) and views to and from the NLA, through the NLA Forecourt and poplars to the footbridge linking the High Court and the National Gallery.

The specific heritage significance of the Lombardy poplars is:

- Historic value—the 'species of choice', selected by Richard Clough of the NCDC, in the original design and development of the forecourt. They have been used historically throughout Canberra and are representative of the NCDC's period of intense development and urban landscape design representative of the design cultural landscape.
- Architectural characteristic—the formal, column-like appearance and symmetry of the two double rows of Lombardy poplar (*Populus nigra* 'Italica') plantings in front of the Library and the lawn terrace of the Forecourt reflect and complement the Late Twentieth Century Stripped Classical style of the NLA. The symmetrical planted trees frame and focus the view to and from the entrance of the Library.
- Landscape setting characteristics—Lombardy poplars are characteristic of Canberra's early landscape and urban design development and were deliberately selected for their symbolism, appearance, and suitability for the climate.
- Association and contributory value—associated with NCDC period of development in Canberra and a physical reminder of the proposed permanent parliament to be located on the southern shores of Lake Burley Griffin, defining the east end of the NLA's east–west axis.

#### **Potential Heritage Value**

- Aesthetic value—the autumnal colour of the tree's leaves, the composition off the twin rows of poplars, creating a formal, vertical/columnar symmetry complementary to the architectural characteristics of the NLA, a Late Twentieth Century Stripped Classical style building. Noting that the aesthetic value held by the community has not been formally tested under the Commonwealth heritage criteria. (GML Heritage 2017, pp. 26-7)

In the context of the Parliament House Vista, there are a range of heritage values which might relate in some way to the poplars. That is, the poplars might contribute to the values. These values have been extracted from the heritage management plan for the vista (Marshall and others 2010, and the full statement of significance is reproduced at Appendix A). A paraphrase of the relevant values is as follows. The Parliament House Vista:

- is strongly associated with and a focus of the development of Australian cultural life and national identity, and the development of Canberra as Australia's national capital;
- has a landscape history which is unique within Australia as an ongoing realisation of the establishment of a national place in an attempt to give a strong identity to the core of the national capital;
- is a landscape unique within Australia as a designed national place, or indeed as a series of component national places, evolving over time and contributing to this larger national landscape;
- is significant to the Canberra community for its aesthetic qualities;
- has creative achievement as a complex of gardens, united by landscape design, intimately bound into the architectonic structure of the various precincts;

- avenues of trees and Lombardy Poplars as sentinels at key locations provide colour, character and contrast – all emphasising the symmetrical design – and the green/irrigated grass... makes a strong contribution to the composition;
- has many important smaller component parklands and gardens which enhance the landscape;
- demonstrates different approaches to landscape design in an attempt to create a distinctive identity for the core of the national area, and integrate them into a harmonious composition as open space at the scale of the indigenous open forest/woodland structure of the region;
- these landscape designs seek to provide an appropriate scale for the built elements in an integrated way, reflecting the tradition of the City Beautiful Movement;
- has a balance of formal and informal landscape treatment achieved through the integration of indigenous natural values and cultural values;
- is an iconic image of Canberra which represents the city to the nation and, potentially, internationally; and
- is the central iconic image representing a key element of the overall Griffins' design for Canberra, the nation's capital.

## Assessment of Impact

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

The significant impact guidelines used by the Department of Agriculture, Water and the Environment define the levels of impact as follows:

- Severe [or High] impacts generally have two or more of the following characteristics – permanent/irreversible, medium-large scale, moderate-high intensity;
- Moderate impacts generally have two or more of the following characteristics – medium-long term, small-medium scale, moderate intensity; and
- Minor [or Low] impacts generally have two or more of the following characteristics – short term/reversible, small-scale/localised, low intensity. (Department of Sustainability, Environment, Water, Population and Communities 2013)

The values text in the following table is taken from the 2017 heritage assessment for the poplars (GML Heritage 2017), as well as the relevant values from the Parliament House Vista heritage management plan noted above.

Table 1. Assessment of Impact against Heritage Values	
Values	Impact/Comment
<b>NLA Forecourt Poplars Heritage Assessment (2017)</b>	
The heritage assessment against the Commonwealth Heritage criteria concludes that the NLA Forecourt and the Lombardy poplars are significant for their contribution to the heritage values of the NLA. The poplars are significant as a species planted during the NCDC period throughout Canberra as designed elements of the landscape. The NLA Forecourt meets criteria a, d, f, and h.	<b>Severe/High impact</b> – given the choice of another species. None the less, an effort has been made to select a replacement species which matches as closely as possible the characteristics of the poplars.

**Table 1. Assessment of Impact against Heritage Values**

Values	Impact/Comment
The NLA Forecourt was designed as an integral part of the NLA. It was designed to complement the classical styling of the building and to reflect the designed cultural landscape of Canberra and the Parliamentary Zone.	<b>Moderate impact</b> – given the replacement species do not fully achieve the columnar form of the original poplars, nor reflect the broader cultural landscape which employs poplars as highlight trees. None the less, trees will be selected which best achieve a columnar form, and formative pruning will also be undertaken to help maintain this form. In addition, an effort has been made to select a replacement species which matches as closely as possible the characteristics of the poplars, such as the autumn colour.
The attributes of the NLA Forecourt which embody the Commonwealth Heritage values are:	<b>No impact.</b>
<ul style="list-style-type: none"> <li>the horizontal platform;</li> </ul>	<b>No impact.</b>
<ul style="list-style-type: none"> <li>rectangular and symmetrical plan;</li> </ul>	<b>No impact.</b>
<ul style="list-style-type: none"> <li>the fountain and verticality of the fountain jets;</li> </ul>	<b>No impact.</b>
<ul style="list-style-type: none"> <li>the species of Lombardy poplar (<i>Populus nigra</i> ‘Italica’) (not the individual trees);</li> </ul>	<b>Severe/High impact</b> – given the choice of another species. None the less, an effort has been made to select a replacement species which matches as closely as possible the characteristics of the poplars.
<ul style="list-style-type: none"> <li>the vertical, columnar form, symmetrical layout of the Lombardy poplars and their seasonal colour; and</li> </ul>	<b>Moderate impact</b> – given the fastigate rather than purely columnar form, and the somewhat different seasonal colouring of the oaks. None the less, trees will be selected which best achieve a columnar form, and formative pruning will also be undertaken to help maintain this form.
<ul style="list-style-type: none"> <li>east–west axis (perpendicular to the Land Axis) and views to and from the NLA, through the NLA Forecourt and poplars to the footbridge linking the High Court and the National Gallery.</li> </ul>	<b>No impact.</b>
The specific heritage significance of the Lombardy poplars is:	<b>Severe/High impact</b> – given the choice of another species. None the less, an effort has been made to select a replacement species which matches as closely as possible the characteristics of the poplars.
<ul style="list-style-type: none"> <li>Historic value—the ‘species of choice’, selected by Richard Clough of the NCDC, in the original design and development of the forecourt. They have been used historically throughout Canberra and are representative of the NCDC’s period of intense development and urban landscape design representative of the design cultural landscape.</li> </ul>	
<ul style="list-style-type: none"> <li>Architectural characteristic—the formal, column-like appearance and symmetry of the two double rows of Lombardy poplar (<i>Populus nigra</i> ‘Italica’) plantings in front of the Library and the lawn terrace of the Forecourt reflect and complement the Late Twentieth Century Stripped Classical style of the NLA. The symmetrical planted trees frame and focus the view to and from the entrance of the Library.</li> </ul>	<b>Moderate impact</b> – given the fastigate rather than purely columnar form. None the less, trees will be selected which best achieve a columnar form, and formative pruning will also be undertaken to help maintain this form.
<ul style="list-style-type: none"> <li>Landscape setting characteristics—Lombardy poplars are characteristic of Canberra’s early landscape and urban design development and were deliberately selected for their symbolism, appearance, and suitability for the climate.</li> </ul>	<b>Severe/High impact</b> – given the choice of another species. None the less, an effort has been made to select a replacement species which matches as closely as possible the characteristics of the poplars.



**Table 1. Assessment of Impact against Heritage Values**

Values	Impact/Comment
<ul style="list-style-type: none"> <li>Association and contributory value—associated with NCDC period of development in Canberra and a physical reminder of the proposed permanent parliament to be located on the southern shores of Lake Burley Griffin, defining the east end of the NLA’s east–west axis.</li> </ul>	<b>Severe/High impact</b> – given the choice of another species. None the less, an effort has been made to select a replacement species which matches as closely as possible the characteristics of the poplars.
<b>Potential Heritage Value</b> <ul style="list-style-type: none"> <li>Aesthetic value—the autumnal colour of the tree’s leaves, the composition off the twin rows of poplars, creating a formal, vertical/columnar symmetry complementary to the architectural characteristics of the NLA, a Late Twentieth Century Stripped Classical style building. Noting that the aesthetic value held by the community has not been formally tested under the Commonwealth heritage criteria. (GML Heritage 2017, pp. 26-7)</li> </ul>	<b>Moderate impact</b> – given the autumn colouring of the replacement species differs from the poplars, and the fastigate rather than purely columnar form of the trees. None the less, trees will be selected which best achieve a columnar form, and formative pruning will also be undertaken to help maintain this form.
<b>Parliament House Vista Heritage Management Plan (2010)</b>	
The Parliament House Vista: <ul style="list-style-type: none"> <li>is strongly associated with and a focus of the development of Australian cultural life and national identity, and the development of Canberra as Australia’s national capital;</li> </ul>	<b>No impact.</b>
<ul style="list-style-type: none"> <li>has a landscape history which is unique within Australia as an ongoing realisation of the establishment of a national place in an attempt to give a strong identity to the core of the national capital;</li> </ul>	<b>Moderate impact</b> – given the choice of another species for the forecourt. The forecourt plantings are a prominent and reasonably strong element in the vista landscape, and the choice of poplars was linked to the wider use of poplars in the landscape.  None the less, an effort has been made to select a replacement species which matches as closely as possible the characteristics of the poplars
<ul style="list-style-type: none"> <li>is a landscape unique within Australia as a designed national place, or indeed as a series of component national places, evolving over time and contributing to this larger national landscape;</li> </ul>	<b>Moderate impact</b> – as above.
<ul style="list-style-type: none"> <li>is significant to the Canberra community for its aesthetic qualities;</li> </ul>	<b>Moderate impact</b> – as above.
<ul style="list-style-type: none"> <li>has creative achievement as a complex of gardens, united by landscape design, intimately bound into the architectonic structure of the various precincts;</li> </ul>	<b>Moderate impact</b> – as above.
<ul style="list-style-type: none"> <li>avenues of trees and Lombardy Poplars as sentinels at key locations provide colour, character and contrast – all emphasising the symmetrical design – and the green/irrigated grass... makes a strong contribution to the composition;</li> </ul>	<b>No impact</b> – on the basis that this value relates to avenues of trees, not row plantings such as at the NLA, and it relates to sentinel poplars, not poplars used in the vista more generally such as at the NLA.
<ul style="list-style-type: none"> <li>has many important smaller component parklands and gardens which enhance the landscape;</li> </ul>	<b>Moderate impact</b> – as above.

<b>Table 1. Assessment of Impact against Heritage Values</b>	
<b>Values</b>	<b>Impact/Comment</b>
<ul style="list-style-type: none"> <li>demonstrates different approaches to landscape design in an attempt to create a distinctive identity for the core of the national area, and integrate them into a harmonious composition as open space at the scale of the indigenous open forest/woodland structure of the region;</li> </ul>	<b>Moderate impact</b> – as above.
<ul style="list-style-type: none"> <li>these landscape designs seek to provide an appropriate scale for the built elements in an integrated way, reflecting the tradition of the City Beautiful Movement;</li> </ul>	<b>No impact</b> – as the replacement plantings will achieve a similar mature height to the original poplars.
<ul style="list-style-type: none"> <li>has a balance of formal and informal landscape treatment achieved through the integration of indigenous natural values and cultural values;</li> </ul>	<b>No impact.</b>
<ul style="list-style-type: none"> <li>is an iconic image of Canberra which represents the city to the nation and, potentially, internationally; and</li> </ul>	<b>Moderate impact</b> – as above.
<ul style="list-style-type: none"> <li>is the central iconic image representing a key element of the overall Griffins' design for Canberra, the nation's capital.</li> </ul>	<b>Moderate impact</b> – as above.

### ***Consistency with Relevant Conservation Policies and Strategies***

The following relevant conservation policy and strategy extracts are drawn from the poplars heritage assessment (GML Heritage 2017) as well as the heritage management plan for the Parliament House Vista (Marshall and others 2010). It should be noted the Vista plan is approved under the EPBC Act, and the NCA is obliged not to take actions inconsistent with the plan. The heritage assessment policies do not have this statutory basis, but rather are just recommendations to the NCA.

<b>Table 2. Assessment of Consistency with Relevant Conservation Policies and Strategies</b>	
<b>Relevant Conservation Policies and Strategies</b>	<b>Consistency/Comment</b>
<b>NLA Forecourt Poplars Heritage Assessment (2017)</b>	
Adopt the revised heritage assessment in this report.	<b>Consistent</b>
Request that the Australian Heritage Council update the NLA CHL entry to include the heritage values associated with the NLA Forecourt, or nominate the NLA Forecourt to the CHL. Noting that the Commonwealth Heritage values of the Parliament House Vista, its listing, and the obligations under the EPBC Act apply and protect the heritage values of the Forecourt.	Future action to be considered by the NCA.
Manage the NLA Forecourt and Lombardy poplars in accordance with the identified heritage values, the EPBC Act and its regulations and the Burra Charter.	<b>Not consistent</b> – given the values identified in the heritage assessment are closely linked in many cases to the poplars as a species, as noted in the preceding table.
Implement the management policies and maintenance regime included in the tree assessment report for the Lombardy poplars.	<b>Partly consistent</b> – noting some are future actions to be considered by the NCA, while others will prove unnecessary given the replacement proposal.
Consider all replacement options presented in Section 4.3, noting that Option 3 would likely have the least impact on heritage values in the long term.	<b>Consistent</b>



<b>Table 2. Assessment of Consistency with Relevant Conservation Policies and Strategies</b>	
<b>Relevant Conservation Policies and Strategies</b>	<b>Consistency/Comment</b>
Undertake a HIA to assess the heritage impacts of actions associated with Option 3 (or another alternative) as selected by the NCA, before proceeding with any works to remove or replace the Lombardy poplars (or any works to the NLA Forecourt).	<b>Consistent</b>
Undertake the preparation of a communication strategy that identifies an approach for community consultation and media messaging for the replacement of Lombardy poplars (Option 3).	Future action planned by the NCA.
Undertake specific stakeholder consultation with groups such as the NLA, Transport Canberra and City Services (ACT Government), the National Trust of Australia (ACT), Guardians of the Lake, Pedal Power ACT, and the Walter Burley Griffin Society. Other stakeholders may be identified by the NCA.	Future action to be considered by the NCA.
Undertake consultation to formally test criterion (e) aesthetic value and criterion (g) social value held by the community. If found to meet the threshold for listing under either or each criterion, ensure that the heritage assessment is updated to reflect the changes, and the nomination/CHL listing if applicable.	<b>Not consistent</b> – this consultation has not yet been undertaken.
If recommended in the HIA, submit a referral under the EPBC Act, accompanied by the HIA and the results of the consultation.	Discussed below.
Ensure appropriately qualified personnel, consultants and contractors are engaged in any assessment of proposed actions or works at the site (such as Option 3) that would impact heritage values.	<b>Consistent</b>
Inform contractors in contact with the Lombardy poplars, and the Forecourt generally, of the heritage values, and ensure they do not to undertake any action that may harm those values.	Future action to be considered by the NCA.
<b>Parliament House Vista Heritage Management Plan (2010)</b>	
<p>Strategy 8.4 If a conflict arises between the achievement of different objectives, the process for resolving this conflict will involve:</p> <ul style="list-style-type: none"> <li>• reference to the conflict resolution process outlined in the NCA's Heritage Strategy;</li> <li>• implementation of a decision-making process in accordance with Policy 8;</li> <li>• compliance with the <i>Burra Charter</i>, in particular Articles 5.1 and 13;</li> <li>• possibly involving heritage conservation experts in accordance with Policy 7;</li> <li>• possibly seeking the advice of the Department of the Environment, Water, Heritage and the Arts; and</li> <li>• possibly seeking a decision from the Minister under the EPBC Act.</li> </ul> <p>In the last case, a decision under Section 28 of the EPBC Act may be necessary because of the nature of the action involved.</p> <p><i>Commentary:</i> The outcome of this process may be a</p>	<p><b>Not fully consistent</b> – while the process for resolving the conflict between conservation and broader environmental objectives has not involved all of the identified actions to date, none the less, key actions (such as the involvement of heritage experts) have been undertaken, and other actions may yet be undertaken (eg. seeking the advice of the Department of the Environment and Energy and a referral under the EPBC Act).</p>

Table 2. Assessment of Consistency with Relevant Conservation Policies and Strategies	
Relevant Conservation Policies and Strategies	Consistency/Comment
<p>matter to be recorded in the NCA's heritage register.</p> <p><b>Policy 16    <i>General conservation provisions for the landscape</i></b></p> <p>The overall Parliament House Vista study area landscape character will be conserved as parkland with a balance of formal and informal elements. In particular:</p> <ul style="list-style-type: none"> <li>• conserve the underlying geometry of the area, including the major boundaries of Kings and Commonwealth Avenues, and Parkes Way, as well as the Land and Water Axes, and cross axes in the Parliamentary Zone, reinforced by the lake, buildings, plantings, parklands, gardens and road system;</li> <li>• conserve the design pattern of large landscapes and waterscapes, treed avenues and bridges (although the bridges are currently strictly outside the formal boundaries of the area) providing framing elements...</li> <li>• conserve the landscape design scale appropriate for the built elements;</li> <li>• conserve the treescape, including the avenues of trees, and Lombardy Poplars as sentinels at key locations either side of the Land Axis;</li> <li>• conserve open spaces as important landscape elements and the existing balance between planted areas and open space;</li> <li>• conserve the complex of gardens, united by landscape design, intimately bound into the architectonic structure of the various precincts, and set within the context of the National Triangle parklands;</li> <li>• conserve the smaller component parklands and gardens...</li> <li>• conserve the balance of formal and informal landscape treatments using indigenous natural values and cultural values...</li> <li>• conserve the replacement of strict symmetry with a balanced development in the National Triangle, reinforced by the lake, buildings, plantings, parklands, gardens and road system, and conserve the stricter symmetry in the Land Axis corridor...</li> <li>• conserve places of reflection and contemplation (ie. the many parks and gardens)...</li> <li>• conserve the accessibility of the area, as a gathering and meeting place, and as a beautiful place.</li> </ul> <p>The sweeping vistas will be maintained...</p> <p>Particular care will be taken to manage the character of the tree canopy in the Parliament House Vista area regarding the evergreen/deciduous mix. The general aim will be to reinforce tree planting to continue an</p>	<p><b>Not fully consistent</b> – given the replacement species involves some dissimilarities with the poplars.</p>

Table 2. Assessment of Consistency with Relevant Conservation Policies and Strategies	
Relevant Conservation Policies and Strategies	Consistency/Comment
evergreen framework with contrast provided by plants displaying seasonal differences in foliage, texture, colour or flower characteristics. In addition to generally conserving the trees in the area, particularly conserve important trees and tree groups (eg. commemorative trees)...	
Strategy 16.2 The NCA will enhance the informal evergreen landscape structure around the margins of the National Library of Australia precinct, similar to the High Court of Australia-National Gallery of Australia precinct, whilst conserving the formal core of the National Library of Australia landscape.	<b>Not fully consistent</b> regarding the conservation of the formal core of the NLA landscape given the replacement species involves some dissimilarities with the poplars.
Strategy 16.3 The NCA will reconstruct the Lombardy Poplar sentinels at key locations either side of the Land Axis where these are missing.	<b>Consistent</b> – insofar as the works have no impact on the sentinel plantings.
<p><b>Policy 17 Conservation provisions relating to specific components of the Parliament House Vista</b> The following landscape features of specific components of the Parliament House Vista area will be conserved...</p> <p>Curtilage of buildings:</p> <ul style="list-style-type: none"> <li>the curtilage of buildings will be managed to respect the significant designed qualities of the curtilage, where these exist.</li> </ul> <p><i>Commentary:</i> This provision only relates to buildings of some individual heritage significance. In some cases the curtilage may be managed by an institution and in other cases by the NCA. This general policy is in addition to specific guidance provided elsewhere.</p>	<b>Not fully consistent</b> regarding respecting the significant designed qualities of the curtilage of the NLA, given the replacement species involves some dissimilarities with the poplars.
<p><b>Policy 17...</b> National Library of Australia:</p> <ul style="list-style-type: none"> <li>conserve the National Library of Australia of Australia building as a free-standing and dominant architectural element in the landscape;</li> <li>new buildings of a sympathetic design (not necessarily mimicking the existing) and appropriately located could reflect the original design intent of having flanking wings for the Library;</li> <li>the important views from the Library to the lake and from the lake to the building will be conserved; and</li> <li>there will be sympathetic conservation management of the setting of the Library, including the formal and symmetrical forecourt plantings, fountain and road layout, and the open lawn areas to the north.</li> </ul>	<b>Not fully consistent</b> regarding the sympathetic conservation management of the setting of the Library, including the formal and symmetrical forecourt plantings, given the replacement species involves some dissimilarities with the poplars.

**Table 2. Assessment of Consistency with Relevant Conservation Policies and Strategies**

Relevant Conservation Policies and Strategies	Consistency/Comment
<p><b>Policy 20 Tree maintenance and replacement</b> The NCA will seek to conserve the treescape of the area and trees replaced as necessary. The design concept relevant to existing plantings will be maintained (eg. irregular group plantings of the one species, line/row plantings, plantation plantings, mix of evergreen and deciduous trees).</p> <p>Special care will be taken of commemorative trees, including associated plaques.</p> <p>The contrast in form and foliage, flowers and fruits provided by the mix of evergreen and deciduous species will be maintained.</p> <p>Trees within the area will be maintained, including periodic tree surgery as necessary.</p> <p>In the case of dead, dying or dangerous trees, those in poor health unlikely to recover, or those displaying such poor characteristics as to substantially detract from the landscape, such trees will be removed. Generally trees will be replaced with the same species, especially in the case of significant trees (eg. commemorative trees). In the case of trees which are part of group, every effort will be made to use an advanced specimen.</p> <p>In the case of replacement trees for significant trees, the NCA will consider:</p> <ul style="list-style-type: none"> <li>• consulting possible stakeholders before removal of the existing tree; and</li> <li>• the possibility of undertaking some ceremony associated with the replacement planting, depending on stakeholder views.</li> </ul> <p>Given that the initial spacing of some group plantings may have been too close to allow trees to develop fully, therefore selective removals could take place to allow remaining trees to develop fully. It will be recognized however, that this may not be possible with closely spaced conifers which may not regenerate where dieback has occurred in the crowns.</p> <p><i>Commentary:</i> Refer to Policy 50 regarding new plantings and to Policy 23 regarding weed species. Refer to Policy 16 for details of significant trees including commemorative plantings.</p>	<p><b>Not fully consistent</b> given the replacement species involves some dissimilarities with the poplars, regarding:</p> <ul style="list-style-type: none"> <li>• conservation of the treescape;</li> <li>• the design concept relevant to existing plantings;</li> <li>• the contrast in form and foliage; and</li> <li>• the general provision for the replacement of trees with the same species.</li> </ul>
<p>Strategy 20.1 The NCA will develop a tree replacement strategy consistent with this plan. This strategy will retain the aesthetic values of the tree plantings that includes seasonal change, olfactory interest, different light and shade qualities, and contrasting form, colour and texture of leaf and bark. The strategy will consider the sequencing of replacement to manage/minimise the impact of any transition phase. The strategy will be prepared using expert arboricultural advice.</p>	<p><b>Not consistent</b> – given no overall strategy has been prepared. None the less, a replacement strategy for these particular trees has effectively been formulated as part of the current proposal. As noted above, this strategy is not fully consistent with intent of some policies and strategies in the heritage management plan.</p>

**Table 2. Assessment of Consistency with Relevant Conservation Policies and Strategies**

Relevant Conservation Policies and Strategies	Consistency/Comment
<p>The strategy will consider the range of relevant previous reports which address tree replacement (eg. Gray 1997 for Parkes Place and Geoff Butler &amp; Associates 2004 for the Parliamentary Zone and Anzac Parade).</p> <p>The strategy will be developed in consultation with the range of stakeholders, including the Canberra community.</p> <p><i>Commentary:</i> An objective of the strategy should be to predict major changes required in at least the next 10 years, and to develop responses.</p> <p>The strategy may draw upon the existing guidance provided in the Parliament House Vista, Interim Management Plan, Tree Maintenance and Replacement (NCA 2005c). The strategy should consider the range of issues dealt with in the interim document.</p> <p>The strategy will include consideration of the:</p> <ul style="list-style-type: none"> <li>• missing Eucalypts along Anzac Parade;</li> <li>• missing plantings either side of the Rond Terraces;</li> <li>• missing and poorly performing trees in the Parliamentary Zone, including avenue and pathway plantings; and</li> <li>• potential impact of Dutch Elm Disease.</li> </ul> <p>Other issues to be considered include planting trees only at the intended mature spacing, that is avoiding over-planting, and the sensitivity of certain species to competition from other trees through close planting, such as conifers.</p>	
<p><b>Policy 23 Weed species</b></p> <p>The NCA will give due consideration to the cultural heritage values of any environmental weeds in the area. Other issues to be considered will include:</p> <ul style="list-style-type: none"> <li>• the degree of the environmental weed problem posed;</li> <li>• management techniques to remove or reduce the problem without removing the plants;</li> <li>• replacing plants with similar species which are not weeds; and</li> <li>• replacing plants with species which are not weeds but provide similar qualities to the original species.</li> </ul> <p>The sequencing of replacement will be determined as part of a replacement strategy, especially regarding trees (see Strategy 20.1).</p> <p><i>Commentary:</i> Environmental weeds include those defined under the ACT Noxious Weeds List.</p>	<p><b>Consistent</b> – the NCA has considered the environmental weed problem posed by the poplars, management of the problem and replacement strategies. However, the ACT Government does not support the use of poplars as the replacement species even though there is no assessed environmental problem in this case.</p>

## *Other Comments*

A key related issue with this proposal is the fate of poplars elsewhere in the Parliament Zone. These trees are highly significant as sentinel plantings at important locations reflecting the geometry of the zone, and as very important plantings in the courtyards of Old Parliament House. The replacement of poplars with another species at the National Library of Australia sets a precedent for the remainder of the zone.

In this context, the proposed replacement plantings are a highly significant issue for the Parliamentary Zone and Parliament House Vista.

## **Conclusions**

Having considered the proposed removal and replacement of the poplars in the National Library of Australia forecourt with another species, it is concluded that the proposed works will:

- have a series of **severe/high or moderate impacts** when considered in the small-scale context of the existing forecourt. Severe/high impacts arise because certain values are tied to the use of poplars as a species. None the less, an effort has been made to select a replacement species which matches as closely as possible the characteristics of the poplars. Moderate impacts arise because the replacement species do not fully achieve the desired qualities of poplars;
- have a series of **moderate impacts** in the larger-scale context of the Parliament House Vista. This relates to the choice of another species for the forecourt. The forecourt plantings are a prominent and reasonably strong element in the vista landscape, and the choice of poplars was linked to the wider use of poplars in the landscape;
- have **no impact** in the case of other values in the smaller and larger-scale contexts;
- be **not consistent or only partly consistent** with a range of relevant conservation policies and strategies, related to the impacts noted above; and
- be otherwise **consistent** with a range of relevant conservation policies and strategies.

The proposed replacement plantings are a highly significant issue for the Parliamentary Zone and Parliament House Vista, as they set a precedent for the future of important poplar plantings in these areas.

It is possible the impacts may be considered a significant impact within the meaning of the *Environment Protection & Biodiversity Conservation Act 1999* given the:

- scale of impacts – severe/high or moderate in the context of the NLA forecourt or Parliament House Vista;
- general prominence of the plantings – they are the substantial landscape element in the NLA setting and a strong component of the Parliamentary Zone;
- heritage significance of the plantings as part of several heritage places – the NLA and the Parliament House Vista; and
- the precedent to be established for the Parliamentary Zone and Parliament House Vista in replacing poplars with another species.

Therefore an EPBC Act referral under Part 7 of the Act may be required.



This referral is also consistent with Strategy 8.4 in the Parliament House Vista heritage management plan regarding the resolution of conflicts, such as in this case between heritage and broader environment requirements.



## Appendix A: Heritage Values – Parliament House Vista

The following text is drawn from Marshall and others (2010, vol. 1, pp. 181-4).



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

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

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

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

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

(Criterion (a))

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

(Criterion (b))

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

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

The Parliament House Vista is of outstanding value to the nation because of its aesthetic values to Australians. It is the most highly recognised part of Canberra for Australians – evoking Canberra and its important meanings and associations. Its aesthetic values as a symbolic and powerful landscape are clearly

evidenced in the high recognition of the Parliament House Vista. The aesthetic characteristics of the Parliament House Vista are strongly connected to its symbolic meanings, and are highly recognised and valued by Australians.

(Criterion (e))

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

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

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

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

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

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

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

(Criterion (f))

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

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

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

The Parliament House Vista is valued highly for its accessibility, as a gathering and meeting place, and as a

beautiful place in which to be. The Canberra community has a deep attachment to the idea that the Parliament House Vista is a place for all Australians.

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

(Criterion (g))

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

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

- Sylvia Crowe, an important landscape architect, especially in Britain but also in Australia – responsible for the masterplan for Commonwealth Park, apparently her only Australian design and a major component of the study area;
- John Crust and Emil Sodersten, as important architects, especially for their design of the Australian War Memorial – this being a crucial and prominent building in the Parliament House Vista;
- Marion Mahony Griffin, important as the contributing designer of the original plan for Canberra as the national capital, including especially the Parliament House Vista;
- William Holford, a leading British architect and town planner who is important for his influence on the design of Canberra as the national capital, including in particular the Parliament House Vista;
- John Smith Murdoch, an early and significant architect in the Commonwealth Government – designer of the Old Parliament House and East and West Blocks, being a crucial and prominent group of buildings in the development of the area;
- National Capital Development Commission staff, who played key role in planning, developing and constructing Canberra including a large number of major components within the study area, or which have otherwise had a major impact on the area;
- Harry Oakman, an important landscape designer and author, instrumental in the development of Commonwealth Park and other landscaping in the Parliament House Vista;
- John Overall, who led the NCDC during its foundation period which saw a dramatic acceleration in the development of Canberra after a long period of neglect, including in particular completion of Lake Burley Griffin;
- John Sulman, an important architect and town planner who played a major role in the development of Canberra – a key advocate for the Old Parliament House development, being a prominent building in the study area; and
- Thomas Charles George Weston, an important figure being responsible for the early detailed plantings which are a major feature of Canberra, including notably the Parliamentary Zone.

(Criterion (h))