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13 February 2012

Manager
Approvals and Wildlife Division
Department of the Environment, Water, Heritage and the Arts
GPO Box 787
Canberra ACT 2601

Via email: epbc.referrals@environment.gov.au

Dear Sir/Madam,

Re: Reference No: 2012/6269

Title: Memorial Development Committee/Tourism and recreation/Rond Terraces Land Axis South of Parkes Way, Canberra/ACT/Construction of two 15m height memorials

Australia ICOMOS welcomes the opportunity to provide comments in response to the proposed development of two new memorials to be sited at the Rond Terraces, south of Parkes Way and ANZAC Parade in Canberra.

Australia ICOMOS, Australia's leading non-government professional organisation for cultural heritage, is the Australian national committee of the International Council on Monuments and Sites. This is a non-government professional/expert organisation primarily concerned with the philosophy, terminology, methodology and techniques of cultural heritage conservation. Internationally, ICOMOS works closely with UNESCO, and acts as UNESCO's principal advisor on cultural aspects of the operation of the World Heritage Convention. As members of an international NGO, we are part of a global professional network.

Australia ICOMOS has a key role in contributing to heritage conservation philosophy, methods and standards of practice in Australia. Our members are professionally qualified and experienced practitioners from a wide range of disciplines, working in all facets of the understanding and protection of Australia's cultural heritage places, at all levels of government and in the private sector. We regularly provide feedback and advice on heritage policy and philosophy to the Australian Government, as well as to State and Territory governments. The Australia ICOMOS Burra Charter 1999, is established as the key benchmark for heritage best practice in Australia, and is also used and referred to around the world as a leading exemplar of heritage conservation principles and practice in countries as diverse as China, the USA and the UK.

In line with Australia ICOMOS' role in advocating best practice in heritage management, our comments on the proposed development focus on matters of best practice relating to the referral documentation, which must contain all information and analysis necessary for robust and defensible decision making in this matter. The proposed development is planned for a crucially important location in or adjacent to a number of EPBC Act protected Commonwealth and National Heritage listed places (Parliament House Vista and Extension, The Australian War

Memorial and Memorial Parade), and in the nationally symbolic designed landscape of Canberra's National Triangle, near the intersection of the Land and Water Axes of Griffin's plan, centred on Lake Burley Griffin. This location is visible from most key viewpoints in the Parliament House Vista and the National and/or Commonwealth Heritage listed Old Parliament House, National Library, National Gallery and High Court. The heritage significance of this landscape has resulted in the nomination of Canberra as a whole for National Heritage Listing. It is possible that this landscape may also be found to possess World Heritage values and it is widely researched and analysed in global academic literature on landscape design and capital city planning. The richness of these heritage values and cultural significance demands that special care and prudence is exercised in planning and approving new work, that new work is of the highest standard of creativity and design excellence, and that it does not detract from the outstanding values of the place as a whole.

Australia ICOMOS is concerned that the Heritage Assessment and Heritage Impact Statement for the proposed development does not follow an accepted methodological process and that the referral contains statements which are not supported in the accompanying report, prepared by Architectural Projects, December 2011. The following specific issues are noted:

Referral Form

- Attachment C on the results of Public Consultation is not provided.
- Section 3.1 (b) National Heritage Places. The section entitled 'slight impact' purports to be an extract from the Heritage Assessment and to be based on further research and analysis contained in the Assessment. This is not the case. This section cannot be found in the Assessment and there is no section of the report that specifically discusses impacts on identified, listed heritage values, and could therefore be used to support the finding of slight impact.

The Heritage Assessment and Heritage Impact Assessment

Section 2.5 Methodology—this section states that 'the methodology used in the evaluation of the place is that recommended by the NSW Heritage Office'. Presumably this refers to the NSW Guidelines for Statements of Heritage Impact. This is not the case. This NSW guideline suggests that Statements of Heritage Impact should at least:

- Discuss aspects of the proposal that respect or enhance the heritage significance of the item or conservation area
- Discuss aspects of the proposal that could detrimentally impact on heritage significance.

A best practice statement of heritage impact would usually:

1. Describe the proposal in a detailed manner;
2. Set out the heritage values of the place
3. Analyse potential impacts on heritage values
4. Discuss potential options for mitigation of impacts, and
5. Conclude with a Statement of Heritage Impact summarising the key findings and usually making a recommendation on the nature of the impact.

The Heritage Assessment and Heritage Impact Assessment for the memorials contains no section which specifically discusses impacts on identified heritage values. The document also contains no conclusion or 'Statement of Heritage Impact' which sums up the findings of the report, because the analysis of impacts on listed values is not undertaken.

The identified heritage values of this precinct are numerous. The referral and accompanying report only focus on views to or from key heritage places. It does not discuss the broad range of other relevant identified values including:

- Relationship to other vertical elements in the Vista
- Compatibility of proposed use with identified values
- Suitability of proposed design style and building materials
- Potential impacts on other identified social, historical, aesthetic and technical values.

Due to these shortcomings, the referral documentation provides an inadequate basis upon which to make decisions on the nature of the impacts on the listed heritage values of this precinct. Accordingly, the proponent should be required to prepare a thorough, expert and credible impact assessment before a decision is taken on the proposal. Given the degree of expert and community concern about the proposal, and the importance of the heritage values of this area, it would also seem advisable that the impact assessment is subject to an independent, expert peer review to ensure the robustness of the assessment.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J. Harrington', with a stylized, flowing script.

DR JANE HARRINGTON
President, Australia ICOMOS