



Australia ICOMOS Secretariat
Faculty of Arts & Education
Deakin University
221 Burwood Highway
Burwood VIC 3125
ph: +61 3 9251 7131
e: austicomos@deakin.edu.au
w: www.icomos.org/australia

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Referrals Gateway
Department of the Environment and Energy
GPO Box 787
Canberra ACT 2601

By email: epbc.comments@environment.gov.au

Dear Madam or Sir

Submission regarding the Australian War Memorial Redevelopment (Reference No. 2019/8574)

On behalf of Australia ICOMOS I write to make a brief submission regarding this proposal which affects a place on the National Heritage List.

Australia ICOMOS (International Council on Monuments and Sites) is a non-government, not-for-profit organisation of cultural heritage professionals formed as a national chapter of ICOMOS International in 1976. Our mission is to lead cultural heritage conservation in Australia by raising standards, encouraging debate and generating innovative ideas. ICOMOS is also an Advisory Body to the UNESCO World Heritage Committee under the World Heritage Convention.

As the referral documentation notes, the Australian War Memorial (AWM) is a major part of a place on the National Heritage List which includes part of Anzac Parade (the Memorial Parade). As such, it is of extremely high heritage value; indeed, as National Heritage it is of outstanding heritage value to the nation. With such high values, an equally high commitment to protection and management of those values is expected. Substantial changes to the AWM should only be undertaken with great care and respect for its values. This does not mean that no changes are possible. Rather, only changes sympathetic to those values should be contemplated.

It is noted that the referral documentation includes a heritage impact assessment, which is an appropriate step in such circumstances. Although Australia ICOMOS has not undertaken a close review of this document, we note that the skills and expertise of the HIA author/s are not identified.

We note that the referral form finds that the proposed redevelopment will have a "significant impact" (pages 7-9, 15, 16), and this reflects the findings of the HIA (pages 156-8, 160-1). The HIA concludes,

"the scope of the proposed redevelopment works will require the removal of Anzac Hall, new builds and changes to the setting and landscape of the Memorial that will impact historic heritage values." (page 172)

While the HIA also suggests that some of these changes could be viewed positively, and it suggests ways to reduce or limit impacts, the underlying finding of a significant impact is a matter of considerable concern regarding a National Heritage place.

It is also worth considering the loss of resources and embodied energy resulting from the demolition of the existing and significant Anzac Hall, a building which is only 18 years old. Anzac Hall was the winner of the 2005 Sir Zelman Cowan Award for Public Architecture – the Australian Institute of Architect's highest award.

Australia ICOMOS strongly recommends that the objective should be to avoid impacts or only undertake changes with a minimal impact. The cumulative impacts of the current proposed and previous changes should also be given due consideration. In order to achieve this objective, the requirements of the AWM may also need to be adjusted to provide an entirely sympathetic solution.

Accordingly, we recommend further consideration of options which involve no or minimal impacts on the Australian War Memorial as a place of National Heritage value.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Helen Lardner', with a long horizontal flourish extending to the right.

HELEN LARDNER
President, Australia ICOMOS