



Medical
Association for
Prevention of War
(Australia)

HeritageGuardians
Equity for our cultural institutions

AUSTRALIAN WAR MEMORIAL REDEVELOPMENT – A LITANY OF FAILURES

July 2021

An overview of the decision-making process for the AWM redevelopment is available [here](#).
A complete campaign diary is [here](#).

ANNOUNCEMENT OF THE REDEVELOPMENT PRECEDED THE DETAILED BUSINESS CASE:

- The AWM \$500m redevelopment was announced by PM Morrison on 1 November 2018, 7 weeks before the detailed business case was fully delivered to the government on 21 December 2018.
- There is evidence to suggest that the project was tailored to use the budget, rather than the budget being a result of the Detailed Business Case documentation. (See paras 15-23, and 86 and 88 of the attachment “Options choice critique”.)

\$8 MILLION VARIATION ON A 12-MONTH CONTRACT FOR A BUSINESS PLAN:

- In January 2018 the AWM entered a 12 month, \$401,500 contract with GHD Pty Ltd for development of the business case for the AWM master plan. This contract was varied in July 2018 to a new contract value of \$8,299,610 – an extraordinary increase for a relatively straightforward 12-month contract. See AusTender CN3482050 and CN3482050-A1 <https://www.tenders.gov.au/Cn/Show/1245bdd7-fa07-95f5-a5a7-b8737d3ee79e>
- Stewart Mitchell, former Head of Buildings and Services at the AWM, raised this in a letter to the Minister for Veterans’ Affairs in February 2019, and received a response from AWM Director Dr Nelson in March 2019 which did not address it. See attached correspondence.

AWM COUNCIL CHAIR KERRY STOKES GAVE A PERSONAL GUARANTEE OF FUNDING TO PM TURNBULL

- Then AWM Director Brendan Nelson told an Interdepartmental Committee on 21 August 2018 of Stokes’s personal guarantee that the AWM would seek only \$500m of government funding. (See AFR report [here](#), and further detail on FOI material [here](#).)

- This raises important questions, such as:
 - What role did it play in sealing the deal?
 - Did this guarantee carry through to PM Morrison?
 - Does it bind the Council after Stokes leaves?
 - What if there is a capital cost blowout? Would weapons companies be called on then? (See [Senate Estimates, October 2019](#), where Sen Jordon Steele-John asked AWM Director Brendan Nelson about this)

MITCHELL OPTION DISMISSED:

- During the tenure of Brendon Kelson as Director of the AWM (1990 – 1994), the Memorial erected in the Canberra suburb of Mitchell a special climate-controlled facility for storage and exhibition of heavy technology.
- In 2012, the AWM Council approved the Mitchell Precinct Development Plan, to acquire additional land and develop new buildings for storage, restoration and maintenance and potential display purposes. Five new sites were acquired, contiguous with the existing Mitchell B and Mitchell C (renamed the Treloar Centre) sites, sufficient to provide facilities for at least the next 100 years.

See the [AWM's Statement of Evidence to the Parliamentary Standing Committee on Public Works](#) in June 2017, section 1.5, which states that “...*the Mitchell Precinct Development Plan estimates an increase of 4,000 square metres of storage per decade will be required to house the collections. Its analysis of collection growth, forecast the Memorial's storage and access needs **for the next century.***” (emphasis added)

- In 2017, the Public Works Committee (PWC) approved the first new additional building, of over 5,000 square metres, on one of those sites - Mitchell 'E'. That building was completed and occupation commenced in 2020. According to the Statement of Evidence to the PWC in July 2017, it was designed to be suitable for both storage and potentially public display. See attachment “Mitchell Precinct Development Principles”, where Principle 9, “Strengthen Public Presence”, refers explicitly to “*the potential for public access **and display** of collection items.*” (emphasis added).
- Therefore, in arguing for expansion at the main Memorial site at Campbell, the Memorial has contradicted arguments it was putting at the same time for construction at its Mitchell annexe.

- Ninety-six percent of the \$498m for the Memorial makeover will go to new exhibition space, mostly for superannuated Defence large technology objects (LTOs), replicating the near-complete facilities for such military hardware in Mitchell. The cost to complete the Mitchell facilities to meet the 100 year LTO exhibition and storage objective has been safely estimated to be less than \$100m. (Details are available from Brendon Kelson; see end of this document). Less than four percent of the project monies will actually be spent on telling the stories of recent conflicts in which Australian forces have been involved. These facts are calculatedly obscured by the AWM.
- The 2017 report by GHD Pty Ltd on options available for an AWM expansion dismissed the Mitchell option for expansion, with claims that it was contrary to 'previous government decisions', when exactly the opposite is true. (See attachment "Options choice critique", paras 134 – 137.)

PUBLIC OPINION:

- Strong opposition to the proposal, including from very authoritative individuals and bodies, has been evident from the start of this project. These opinions have been ignored and ridiculed; see for example [here](#).
- The public support for the proposal that was claimed at the time of the announcement was on the basis of feedback from just 134 people in two months in 2018. A Heritage Guardians petition in April 2019 opposing the proposal gained 1,236 signatures in just two weeks.
- An open letter from 83 distinguished Australians of diverse backgrounds, opposing the project, [was published in April 2019](#). Many of these people, and others, signed a collective [submission to the Public Works Committee](#) in June 2020 and an [open letter to the Prime Minister](#) in October 2020.
- Media commentary has generally been strongly opposed to the proposal. A documented 90% of the many Canberra Times letter writers on the subject from early 2019 to mid-2021 were against the proposal, as have been very many callers to radio (seemingly a strong majority, but an undocumented number).
- On 29 June 2019, a Canberra Times readers' poll reported that 80% of respondents said "Yes" to the question "Do you support the call by former War Memorial director Brendon Kelson that the proposed \$500 million expansion should be dropped?"

- On 12 June 2021, a Canberra Times readers' poll reported that 82% of respondents said "No" to the question "Do you support the NCAs decision to approve works for the Australian War Memorial Expansion?"
- A poll by The Australia Institute conducted in May 2021 reported that 75% of Australians believed the project's \$500 million budget would be better spent on health, education, and veterans' support services. Just 13 per cent preferred that such funding be spent on the Memorial. See [here](#).
- AWM surveys have been heavily skewed towards getting the desired results. The Memorial has not displayed for easy public scrutiny the biased information it presents to those being surveyed and the leading questions for which positive responses are extremely likely. This information is only available by knowing exactly where to look on the AWM website amid hundreds of pages relating to the redevelopment.
- At no time has the AWM shown interest in, or concern at, the huge gulf between the results of its own surveys and the contrary results produced by others.
- See attachment "AWM Claims of Public Support – Evidence Misrepresented" for further information.

MISLEADING PARLIAMENT:

On fulfilling the AWM Act:

- The [Memorial's submission to the Public Works Committee](#) in February 2020 (para 3.1) stated:

*"The Initial Business Case, prepared in 2017, considered eighteen options in addition to the 'business as usual' or 'do nothing' option. These options considered a range of management-based approaches, commercial or leased options, adaptive re-use, and new construction options. The outcome of the Initial Business Case was that Government approved an option that involved the creation of the additional space on the Memorial's Campbell site on the basis that this solution was **the only one that enabled the Memorial to fully meet its obligations as defined in the Act.**"* (emphasis added)
- The redevelopment has been consistently stated by the AWM to be for the purpose of "[telling] Australia's continuing story of service and sacrifice", with no reference to commemorating those who have died. (See, for example, the AWM website, [here](#), accessed on 8 July 2021.)

- It is the AWM's corporate plan for 2020 – 2024, not the AWM Act, which states that the institution's purpose is *"to commemorate the sacrifice of those Australians who have died in war or on operational service, **and those who have served our nation in times of conflict.**"* (emphasis added).
- The AWM's Corporate Plan shifts the balance strongly away from a commemoration of our war dead, as set out in the AWM Act, to a recognition of military service per se.
- One should note also the "mission creep" that the project has acquired, with the comments by [AWM Council chair Kerry Stokes to the Public Works Committee on 14 July 2020](#), to the effect that our war dead are good for tourism: *"And, of course, it still is a place for tourists. Because it's so important to us, it attracts a lot of tourists. It's the second-most-visited place in the country. When you put that together with Parliament House, it makes Canberra the most interesting place to visit, which has an economic benefit to the nation as well as the soul it provides..."* (page 33)

On veterans' welfare:

- Former AWM Director Brendan Nelson repeatedly spoke about the AWM providing a "therapeutic milieu" for veterans, often elevating this to the primary purpose of the redevelopment. See for example [here](#), where he wrote, on 20 April 2019, that *"The Memorial tells stories of men and women that hurt, and stories that heal."*
- This is inconsistent with the AWM Act, which does not mention 'veterans' or their welfare. The Memorial has no responsibility for veterans' welfare. This is not to say the Memorial should be insensitive to the welfare of our military veterans, but even if the AWM *were* to have responsibility for veterans' welfare, there is zero evidence that the redevelopment would be the best way to spend \$498 million in promoting it. There is no evidence of a documented role for memorials in treating PTSD, and there are no guidelines on military acquired PTSD that propose therapeutic military museum visits. Dr Nelson trivialised a very complex and crippling health issue that many of our war veterans face.

On the extent of public support for the redevelopment:

- Mr Anderson stated to the Foreign Affairs, Defence and Trade Legislation Committee at Senate Estimates on 24 March 2021 (page 164 [here](#))

"....in the last survey that we conducted, which was leading into this current process of community consultation, 4,000 people nationally were engaged about the

development, about the project, about the galleries, what they'd like to see et cetera. Only six per cent of the 4,000 were opposed to the development."

- Anderson made no mention of the credible indications of public opinion being almost the polar opposite of the figures he cited. (See above, "Public Opinion", and the attachment "AWM Claims of Public Support – Evidence Misrepresented".) For example, he did not mention that ¾ of the 77 submissions to the Public Works Committee were against the proposal.
- Earlier, [on 14 July 2020, AWM Director Matt Anderson told the Public Works Committee](#): *"After a summary of seeing the plans of the development, 86 per cent of those [visitors to the AWM] who responded to our survey agreed with the need to more fully tell the stories of modern conflicts, peacekeeping and humanitarian operations; 81 per cent strongly agreed, or agreed, that the development will deliver improved social heritage values to the memorial; and only five per cent opposed the development."* (page 31)
- Such data lack credibility. Their presentation, without the full picture of what the respondents were told, what they were not told about the project, its cost and other possible ways to tell the stories of modern conflicts, is deliberately misleading.
- [This link](#), cited above, on the poll by The Australia Institute, provides further links and comment on AWM polling.

On the role of "large technology objects" (LTOs):

- [In oral evidence to the Public Works Committee on 14 July 2020](#), AWM Council chair Mr Stokes stated: *"There were a lot of comments about the large objects and those that appeared in the current plans, particularly the F-11. Nothing's been decided yet in terms of what goes into the galleries."* (page 36)
- This is contrary to repeated indications that the new galleries are intended significantly for large technology objects (LTOs). See attachment "The role of large technology objects in the AWM redevelopment" for a list of such indications.
- The AWM concept development report - 'GHD Options Assessment Report' dated 18 August 2017 looks at options for development of the AWM. Whilst the assessment methodology is questionable it shows that increased display space, including for LTO's, is the driver for the proposal — not capability of the site to handle expansion (and this is one of the key issues identified in the Australian Heritage Council letter).

- This matter is of considerable importance, as the role of LTOs is the cause of much commentary to the effect that the AWM is being transformed into a military theme park.
- It is hard to believe that the inclusion of prominent displays of LTOs was not a key feature of the redevelopment planning. One cannot properly specify, design and business case a new building/space/development without having a developed sense about what it will contain. Such advanced planning is needed for even the basics like access, floor space, roof height, maintenance, fire, power, loadings etc.

FAILURE TO ADMINISTER THE EPBC ACT:

- Serious concern at the redevelopment proposal was expressed by:
 - the Australian Heritage Council (AHC). See two letters attached – to the Department of Environment and Energy on 12 Dec 2019, and to the AWM on 31 July 2020.
 - the National Trust (ACT), in submissions to the PWC and to the EPBC/AWM consultation.
 - the Australia ICOMOS (International Council on Monuments and Sites)
 - the Historic Heritage Section (HHS) of the Department of Agriculture, Water and the Environment
 - other heritage experts
- Despite the virtually unanimous concern from heritage experts, including from the AHC which advises the government, and from the Minister’s own department, Environment Minister Sussan Ley gave EPBC approval on 10 December 2020, stating that a “rigorous assessment” had been considered. The conditions of approval set by the Minister do not remove or substantially reduce the heritage impacts identified by the AHC and HHS.
- The development conflicts with the Memorial’s own Heritage Management Plan (HMP) 2011 and the 2019 review of that plan. According to each of these plans, Anzac Hall should be retained and conserved.
- Additionally, the EPBC Act requires HMPs to be reviewed and updated every 5 years. This has not occurred. The AWM’s 2019 HMP review has still not been completed and endorsed (as at mid-July 2021).
- The impacts of the redevelopment will remove, reduce or damage the identified National Heritage values. This is a serious issue and a flaw in due process at the

highest levels. This shows a whole of Government mismanagement, not just an AWM mismanagement.

- For the last 3 years the AWM has no longer annually reported to Government on its EPBC Act built heritage achievements and responsibilities - as specified by its (now out-of-date) EPBC Act required heritage documentation.

EPBC ACT DEVELOPMENT CONSULTATION PHASE

- The process of public consultation on heritage (EPBC) matters, from November 2019 to February 2020, was confused and confusing. The purpose and scope of the consultation sessions was very unclear. AWM documentation of their referral to the (then) Department of the Environment and Energy included hundreds of pages of attachments, with no summary of the key issues. Public engagement was clearly not a priority.
- The EPBC Act consultation received 167 submissions. The AWM's own report classified each of them as 'generally supportive' or 'generally not supportive'. There were 64 (38 per cent) shown as generally supportive, 97 (58 percent) as generally not supportive, and the remaining six submissions (4 per cent) were mixed or neutral.
- As noted, a submission from the AHC to the EPBC consultation identified significant negative heritage impacts of the proposal, which have not been addressed in the development approved by the Minister.

PUBLIC WORKS COMMITTEE

- During 2020, the Public Works Committee received 77 submissions on the AWM proposal, by far the largest number it had ever received on anything since it started in 1913. Approximately ¾ of the submissions were against the proposal.
- Nevertheless, in February 2021 the PWC recommended (with a dissenting report) that the project proceed. The Committee's report downplayed the quantity and quality of the opposition. See further commentary [here](#).

NATIONAL CAPITAL AUTHORITY:

Salami slicing:

- The National Capital Authority (NCA) has been complicit in the process by granting approvals for small parts of the redevelopment project before the project as a whole is authorised. A key example of this is the new east carpark in 2019 and its works approval by the NCA, in isolation of the associated much larger development.

- But the most stark example was the NCA approval in early June 2021 for “early works” which included the demolition of Anzac Hall, major excavations at the front of the Memorial and the removal of 140 trees – and all this before it had even received the AWM application for the main works for the redevelopment.

Failure to make independent assessments or heed warnings:

- The NCA did not independently assess, or heed the authoritative warnings about, the heritage impacts of the redevelopment. It appeared to abrogate any NCA responsibility for assessing heritage impact in areas under NCA influence. The NCA website stated, in relation to the “early works” approval process: *“The approval by Minister Ley satisfies the heritage conditions of the Plan [NCP] and will guide the NCA’s assessment in this matter”*.

Dismissal of overwhelming public opinion:

- The NCA received over 600 submissions on the “early works” application. Of these, just 3 supported the early works. Despite this almost unanimous public rejection of the works, the NCA approved them. The NCA’s claim of “commitment to community engagement” is clearly a sham, and this undermines trust in our democracy. See Heritage Guardians’ commentary [here](#).

Failure to respond adequately to the public:

- The NCA was unprepared for such a huge number of public submissions on the “early works”, but instead of taking the time necessary to handle them properly, the process was rushed and inadequate. For example, the process of seeking permission to publish submissions was incomplete and clearly not a priority.
- A number of those who submitted to the NCA inquiry on “early works” subsequently requested a Statement of Reasons under the ADJR Act, but the NCA response to these requests appeared to be a “one size fits all” response to all. There was no attempt to respond to individual concerns raised. See Heritage Guardians commentary [here](#).

SPENDING MONEY BEFORE IT’S APPROVED:

- A series of steps involving expenditure of public funds have pre-empted proper decision-making processes, thereby representing a rort on the public purse.
- Both the immediate past and the current director of the AWM, Dr Nelson and Mr Anderson, consistently spoke of the redevelopment as if it were fully approved, even when this was definitely not the case. (As at mid July 2021, it is not yet fully approved.)

- As just one example, in [this interview](#) (from about 16 minutes) on 30 April 2020, Anderson spoke of being “*heavily into the redevelopment*”, and said that the challenge for the next 100 days (while the doors were closed for COVID) was to determine what could be done by way of pre-works that might not otherwise have been possible.
- As early as April 2018, AWM Director Brendan Nelson was touting \$500m being available. See [here](#), [here](#) and [here](#).
- Tenders for parts of the work were advertised from early 2019, saying the project had been ‘approved’ by the government, when no formal approvals had been given. The Memorial’s catering contractor, Trippas White Group, started pitching the new, remodelled Anzac Hall to potential customers as early as July 2019. (See [here](#), 23 July 2019 update.)
- Nelson testily [told critics](#) in August 2019 that “the train has left the station”.
- The AWM website has promoted the redevelopment as a foregone conclusion. In relation to the newly acquired F-111 in May 2019, it stated:
“From late 2020, it and other large aircraft including Lancaster “G for George” will be on public display at the Mitchell Storage facility throughout the redevelopment and expansion of the Memorial’s Campbell site.”
- In early March 2021, the AWM announced the removal of exhibits from Anzac Hall, before the “early works” destruction of Anzac Hall was approved, and long before the AWM had even applied to the NCA for the redevelopment as a whole. (The latter step has not yet occurred, as at mid-July 2021.)
- The cost of “public consultation” which is then ignored should be factored into the travesty of accountability and good governance that is represented by this project.

FURTHER INFORMATION:

- David Stephens, Convenor of Heritage Guardians and Editor of the website Honest History which has documented the whole AWM redevelopment process to date, including the measures of public opinion. Email admin@honesthistory.net.au , phone 0413 867 972
- Brendon Kelson, AWM Director 1990 – 1994. Email brendon.kelson@gmail.com , phone 0418 975 594

- Stewart Mitchell, former Head of Buildings and Services at the AWM. Email stemit55@tpg.com.au, phone 0409 600 830
- Richard Llewellyn, Registrar of Collections, Australian War Memorial 1986-1995. Email riclew@aapt.net.au, phone 0490 458 566
- Steve Gower, AWM Director 1996 – 2012. Phone 0412 036 344
- Sue Wareham, President of the Medical Association for Prevention of War. Email sue.wareham@mapw.org.au, phone 0407 924 152

ATTACHMENTS:

- Options Choice critique (of the AWM's *Options Assessment Report* of August 2017, and the *Design Options* paper of June 2018)
- Anzac Hall – timeline on AWM decision to demolish
- Stewart Mitchell to Minister Chester (Veterans' Affairs), 4 Feb 2019
- AWM to Stewart Mitchell, 8 March 2019
- AWM Redevelopment: the Mitchell Option Reassessed
- Mitchell Precinct Development Principles
- Open letter from 83 distinguished Australians
- AWM claims of public support – evidence misrepresented
- The role of large technology objects in the AWM redevelopment
- Letter Aust Heritage Council to Department of Environment and Energy, 12 December 2019
- Letter Aust Heritage Council to AWM, 31 July 2020
- Letter ACT Heritage Council to Environment Dept, 13 Dec 2019
- Submission from Australia ICOMOS (International Council on Monuments and Sites)
- Salami slicing by the NCA, March 2021

AWM REDEVELOPMENT – A LITANY OF FAILURES

ATTACHMENTS

	TITLE	PAGES
1.	Options choice critique	1
2.	Anzac Hall – timeline on AWM decision to demolish	25
3.	Stewart Mitchell to Minister for Veterans’ Affairs, 4 Feb 2019	27
4.	AWM to Stewart Mitchell, 8 March 2019	29
5.	AWM Redevelopment: the Mitchell Option Reassessed	30
6.	Mitchell Precinct Development Principles	57
7.	Open letter from 83 distinguished Australians	59
8.	AWM claims of public support – evidence misrepresented	63
9.	The role of large technology objects in the AWM redevelopment	65
10.	Letter Australian Heritage Council to Department of Environment and Energy, 12 December 2019	67
11.	Letter Australian Heritage Council to AWM, 31 July 2020	69
12.	Letter ACT Heritage Council to Environment Dept, 13 Dec 2019	71
13.	Submission from Australia ICOMOS (International Council on Monuments and Sites), 11 Dec 2019	73
14.	Salami slicing by the NCA, March 2021	75

The Australian War Memorial extensions: a critique of the design choice

Richard Llewellyn*

Contents

Executive summary.....	1
Introduction: two puzzling documents lacking context. A ‘snow job’?	7
Wasting Anzac Hall: how did this happen?	9
Approval processes and the gathering of evidence.....	10
Use of the terminology ‘business case’ and ‘metric’	11
Exhibition, visitor and storage space requirements	13
Practical considerations for multi-level and subterranean exhibition space development	15
Examination of the available documentation for reliability, veracity and objectivity	16
The <i>Design Options</i> paper and scoring the final four options.....	23
Conclusion	23

* Richard Llewellyn held the senior position of Registrar at the Australian War Memorial from 1986 to 1995. This paper has been prepared with the assistance of Brendon Kelson, former Deputy Director (1981-90) and Director (1990-94) of the Memorial, and David Stephens, member of Heritage Guardians and editor of the Honest History website. [The campaign diary of the Heritage Guardians campaign against the War Memorial extensions.](#)

Executive summary

Introduction: two puzzling documents lacking context. A ‘snow job’? (pages 7-9)

1. The *Options Assessment Report* (August 2017) and the *Design Options* paper (June 2018) have been lodged on the Australian War Memorial’s website and provide background to the Memorial’s redevelopment project. The papers raise as many questions as they answer.
2. It could be argued that the papers have been made available just as much to ‘snow’ the public as to support the case for the project. Meanwhile, the future of the Memorial – an institution belonging to the whole nation – is being settled in the shadows by a small group.
3. For example, it is unclear how far the Memorial’s plans have changed since its Council considered the *Design Options* paper in July 2018, and how much extra display space the

proposed redevelopment will deliver. (The Director of the War Memorial, Dr Brendan Nelson, seems unsure of this second, basic point.) The *Detailed Business Case* went to the then Government in December 2018. Why not make this document available to the public?

Wasting Anzac Hall: how did this happen? (page 9)

4. Nor do the documents tell us why – and precisely how – the demolition of the award-winning Anzac Hall came to be part of the preferred option. It is important to know this, given the vehemence of opposition – especially from architects – to this part of the project.
5. Did individual members of the Memorial Council, perhaps the Chairman, have strong views on deleting Anzac Hall? What did other Council members say? Transparency requires, as a minimum, the release of all relevant Council Minutes.
6. We do not even know at what level of government the project was approved: Cabinet? exchange of letters? Captain's Call? Did the expenditure go through the normal testing of the Budget process, New Policy Proposals and so on, or did it get an inside track? If the funding went through the Budget process, why was it announced in November 2018 rather than in the Budget five months later? If it is the case that Labor supports the project, which version of it did it support? We are not told any of these things.
7. Despite the release of these two documents, the decision-making process on the extensions has been characterised by discussion behind closed doors, a carefully managed consultation process (eliciting 'feedback' from just 134 people), and long (but unpublicised) monologues from Director Nelson in Senate Estimates.

Approval processes and the gathering of evidence (pages 10-11)

8. It appears that government approval for funding was given based upon documentation developed only to a cost confidence level of 50 per cent (P50), rather than 80 per cent (P80), as required by Department of Finance rules. It is somewhat cavalier to approve a budget of \$498 million on the basis of only a 50 per cent chance of the project being completed within budget.
9. Examination of the *Options Assessment Report* suggests that remarkably little reliable evidence was gathered during the *Report's* preparation. In fact, the *Report* can be read as nothing more than a detailed (though loosely accurate) statement of a predetermined position requiring 'validation' through a consultant's report.
10. In other words, the answer was written before the questions were asked.

11. It is axiomatic that an organisation does not engage consultants to prepare reports of this nature unless it has a clear vision both of what it requires the consultant to come up with *and* the mechanism to ensure this conclusion is reached. The *Options Assessment Report* appears *prima facie* to be an example of that truism.

Use of the terminology ‘business case’ and ‘metric’ (pages 11-13)

12. The *Options Assessment Report* refers to ‘metrics’ used for assessing options but only includes one metric (apart from some references to distances). Other so-called metrics are actually objectives or goals or aims.
13. The metric of a ‘nominal’ area of 10,000 square metres appears as a target for what is nebulously stated as ‘adequate space, for current requirements’. That formulation seems to mean ‘the space we guess we will need in the foreseeable future’.
14. In assessing the degree to which options meet objectives the Memorial’s consultants used a subjective measure to determine success against another subjective measure.

Exhibition, visitor and storage space requirements (pages 13-15)

15. Assessment against technical standards is largely missing from the *Options Assessment Report*, but emotive, evidence-free putdowns of non-preferred options are common.
16. Expenditure of the magnitude suggested *should* be supported by a robust and reliable presentation of the reasons for it, not just simple statements of belief.
17. The *Options Assessment Report*’s ‘nominal’ space requirement of 10,000 square metres for the expansion of exhibitions is entirely unsupported by reasons, or information about the use that would be made of this space, beyond the generality of telling ‘the story’ or stories.
18. The Memorial’s promotional video shows a number of aircraft located in generous space. How many of the stories are about these space-gobbling machines? Given that the Memorial has acquired many aircraft and helicopters and has to find space for them, was the space requirement decided on the basis of the size and number of machines needing accommodation?
19. Without a supporting case, the nominal figure for space requirements can be considered an ambit claim at best. And the subsidiary claims for increased visitor access space, and so on, are only meaningful if the basic exhibition space claim is supportable.
20. Then, how does the financing of the project connect with the assessment of space requirements? The fact that funding of around \$500 million was being talked about many months before the *Detailed Business Case* had been completed might suggest that the space claim was developed as a ‘What can we do with this budget?’ exercise. In other words that the dollar figure came first.

21. It seems clear from the evidence that space requirements were still being considered, and options being weighed, in early to mid-2018 at a time when the \$500 million estimate was in the public domain and being discussed. There was certainly scope to adjust the plans in the light of information about how much money was likely to be available.
22. The fact that the Forward Estimates now (May 2019) contain parts of the \$498 million under 'Capital measures' (rounded: 2019-20: \$26.2m; 2020-21: \$36.7m; 2021-22: \$31.6m; 2022-23: \$65.6m), does not of itself mean that the figures are soundly based or set in stone.
23. In any case, the Appropriations Bills linked to those estimates lapsed at the dissolution of the 45th Parliament. If the Coalition is returned at the election, the Bills will be reintroduced; if there is a new government, there will be a revised Budget.

Practical considerations for multi-level and subterranean exhibition space development (pages 15-16)

24. The preferred option (Option 1) of replacing Anzac Hall with a two-level structure (of which one level would be substantially if not completely underground) is an extremely poor idea. It is costly, cumbersome and fraught with unnecessary risk factors to do with the heaviness of Large Technology Objects, difficulties in manoeuvring them, the need for multiple access points, drainage, and other factors.
25. If these factors are ignored and the attendant risk not recognised within the evaluation matrix, then any such option is not being presented honestly or accurately.

Examination of the available documentation for reliability, veracity and objectivity (pages 16-23)

26. The *Detailed Business Case* was delivered to the Government on 21 December 2018, prior to the provision of construction funding in the 2019 Budget, but after the Prime Minister had announced that the Government had agreed on a funding figure of \$498 million.
27. To evaluate the reliability, veracity and objectivity of the *Detailed Business Case*, it is reasonable to sample the documentation supplied. If that sample indicates deficiencies, then it follows that the *Detailed Business Case* is flawed, because not all options have been presented fairly for consideration. Department of Finance rules say: 'All options considered' in the *Initial Business Case* and *Detailed Business Case* 'must be comparable and assessed objectively and consistently'.
28. This paper examines the option in section 4.2 of the *Options Assessment Report*, namely 'Utilise the Memorial's Mitchell Facility'. The *Report* dismissed this option, but the reasons for excluding it from further consideration are highly suspect.
29. The *Report*'s dismissing of the Mitchell option is contradicted by the Memorial's current practice of reporting visits to the Mitchell premises along with visits to the Campbell site.

30. Use and development of the Mitchell site would have no impact on the Memorial's commemorative and research functions. The extent to which the Mitchell site is used is a Memorial management decision, not driven by deficiencies at Mitchell. Mitchell is well located for transport.
31. Arguments against the dispersal of commemorative objects across sites apply also to local war memorials and to the Sir John Monash Centre, more than 15,000 kilometres away in France.
32. Technology objects (large or otherwise) that are merely illustrative examples do not necessarily need to be located near the main 'stories' if they are not essential to or referenced in those stories.
33. Development of already acquired land adjacent to the Mitchell centre deserves close consideration. Moreover, the lack of recognition of the original role of the Mitchell centre, as approved for construction by the Public Works Committee (1992) for combined storage and exhibition use, contradicts past government approvals in relation to Mitchell.

The *Design Options* paper and scoring the final four options (page 23)

34. Option 1, including the demolition of Anzac Hall, comes out ahead of the other three options in the final contest. What is notable, however, is the meagre scores tallied in the scoring undertaken by consultants and Memorial staff. Option 1, the preferred way forward to spend \$498 million, scored only 57.67 'Total Weighted Score (out of 100)'. That is hardly a ringing endorsement.

Conclusions (pages 23-24)

35. The Australian War Memorial belongs to the whole nation, but its future is being settled in the shadows by a small group. The deletion of Anzac Hall, late in the process and for obscure reasons, is symptomatic of a flawed process.
36. The Memorial's future space requirements are vaguely expressed – essentially an ambit claim – and seem to be driven mainly by the need to find space to 'park' superannuated military equipment taken on from the Department of Defence. The need to provide recent veterans with a 'therapeutic milieu', sometimes stressed by the Director of the Memorial, appears nowhere in either of the documents released.
37. The treatment of the options lacks assessment against metrics, but is subjective (including a subjective assessment against subjective criteria) and often emotive and evidence-free. The *Options Assessment Report* is a good example of a consultant's report prepared to fit a predetermined conclusion.

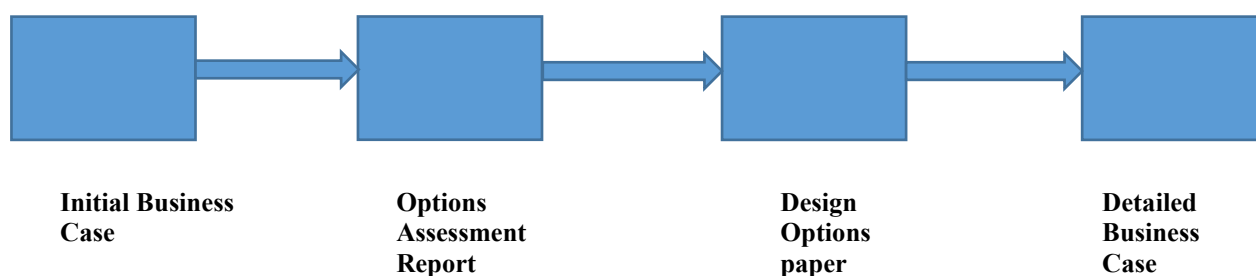
38. The space requirement estimate may have been influenced by knowledge of how much funding was likely to be available for the project. Subsidiary space estimates are flawed because they flow from a flawed estimate for exhibition space.
39. The 'new' two level Anzac Hall is an extremely poor idea, fraught with difficulties regarding point loadings, access and drainage.
40. A case study of the *Options Assessment Report's* treatment of options (looking at the option to use the Memorial's Mitchell facility) shows the *Report's* work is highly suspect and fails to meet Department of Finance criteria that options 'must be comparable and assessed objectively and consistently'.
41. It is not surprising that, scored against a matrix of criteria, the ultimately preferred option (including deletion of Anzac Hall) scored only 57.67 points out of 100.

Introduction: two puzzling documents lacking context. A ‘snow job’?

42. The Australian War Memorial has posted [two documents on its website](#) as background to the proposal to spend \$498 million on extensive redevelopment and expansion of the Memorial (hereafter called ‘the project’).
43. The first document is the *Options Assessment Report* (hereafter the *Report*), ‘a high level assessment of the options, either viable or not’, considered during the development of the project’s *Initial Business Case* (section 1.2). This document is marked © GHD 2019, but appears to have been produced in 2017 (see the annotation ‘Rev A, Approved for issue 18.08.17’ on page 37). The actual *Initial Business Case* documentation seems not to be available to the general public.
44. The second document is the *Detailed Business Case Design Options Development and Assessment* briefing paper (hereafter the *Design Options* paper) submitted to the Memorial Council for consideration at its meeting of Tuesday, 3 July 2018. According to the covering note, the paper presented ‘four five per cent design options for the Redevelopment Project for Council discussion and agreement on a preferred option for further development’. The Memorial’s consultants, GHDWoodhead, were to ‘develop the [Council’s] preferred option to a 30 per cent design completion, and develop the [*Detailed Business Case*] with a full cost benefit analysis’.
45. The cover note to the *Design Options* paper includes a succinct description of the proposed project, as it stood in June 2018 when the paper was signed off by Memorial senior officers to present to the Memorial Council.

If approved by Government, the proposed redevelopment will substantially increase exhibition and public program space in the Memorial building to tell stories of current and recent conflicts, operations and peacekeeping and humanitarian missions. It will also include new temporary or travelling exhibition space; improved visitor orientation, wayfinding and amenities; veteran support facilities, new education facilities, theatre and functions space. There will be an extension to the Bean Building to integrate research collections and reader services, and to optimise the space in the Memorial building for exhibitions by relocating collections stores in the Memorial Building to the Bean Building.

46. It is difficult to describe these two documents – the *Options Assessment Report* and the *Design Options* paper – as a justification for or explanation of the project. They raise as many questions as they answer. The diagram shows simply the relationship between key elements:



47. It could be argued, indeed, that the *Report* and the *Design Options* paper have been made available just as much to ‘snow’ the public as to support the case for the project. [Director Nelson \(page 154 of the Official Hansard\)](#), said in February 2019 that the *Detailed Business Case* went to the Government on 21 December 2018. Why not make that document available?
48. How far have the Memorial’s plans changed since these two documents were produced? There is, for example, a lack of clarity about how much additional floor space the proposed extensions will deliver. On ABC Local Radio Canberra on 10 April 2019, War Memorial Director Nelson referred to ‘the extra 6000 square metres of exhibition space’ (audio expired but [transcript page 6](#)). [In the Canberra Times on 20 April 2019](#), though, Dr Nelson wrote of ‘taking the exhibition space in [Anzac Hall] from 4700 square metres to 12,800 square metres [that is, an increase of 8100 square metres in that space alone]’.
49. Then, in the plans in the *Design Options* paper for Option 1, the ultimately preferred option, there are two figures against the ‘functional zone’ of ‘Gallery’ of 24,280 square metres ‘Area’ and 24,524 square metres ‘Required Area’. Yet, there is in the *Options Assessment Report* a mention of a nominal 10,000 square metres as ‘adequate space, for current requirements’ (see below Table 1 ‘Compulsory Criteria’). How do these figures reconcile?
50. Further, in a flurry of figures on pages 9 and 10 of the *Design Options* paper, for Option 1 we see 18,788 [square metres] for ‘Total New Space’, 19,956 for ‘Total Refurbished Space’, and 12,000 for ‘Total’ in a table labelled ‘Location of Additional Gallery Space and Circulation’. Could that 12,000 be the same as Dr Nelson’s 12,800? Presumably, someone in the Memorial has a proper handle on these figures; the lay reader is left puzzled and perplexed. What did the Memorial Council make of them?
51. Looking at design features, the *Design Options* paper contains no mention in any of the four options of a car park on the northern side of Treloar Avenue, [now proposed by the Memorial](#). On the other hand, the options have a multi-level carpark on the current site.

Wasting Anzac Hall: how did this happen?

52. Nor do the documents tell us why – and precisely how – the demolition of Anzac Hall came to be part of the preferred option. It is important to know this, given the vehemence of opposition – [especially from architects](#) – to this part of the project.
53. We are told at pages 5, 8 and 11 of the *Design Options* paper that Option 1, the option recommended, was ‘amended’ to include the demolition of Anzac Hall. At page 11 there is this about Option 1:
- This option was based on the Building Concept Masterplan, developed by the Sydney-based design firm Johnson Pilton Walker Pty Ltd, endorsed by the Memorial in 2017 and amended through discussion and consultation with the GHDWoodhead architecture team in the development of the option.
54. Given how long the retention of Anzac Hall remained a ‘live’ element in the process – Anzac Hall was retained in *each* of the last four options until those ‘amendments’ occurred – it is important to know how this element was deleted. Amended when? Did individual members of the Memorial Council, perhaps the Chairman, Kerry Stokes, have strong views on deleting Anzac Hall? (The Chairman, a generous benefactor of the Memorial, [donated \\$740,000 towards the cost of the project launch](#) – minus Anzac Hall – on 1 November 2018.) What did other Council members say?
55. Transparency requires, as a minimum, the release of all relevant Council Minutes. If it is true, as Director Nelson claims, that in the Memorial resides ‘the soul of the nation’, then maximum transparency is only right and proper. Leaving aside metaphysical considerations, the Memorial is not the property of its Director, its Council, or even of veterans, but of the whole nation.
56. Despite the release of these two documents, the decision-making process on the extensions has been characterised by discussion behind closed doors, [a carefully managed consultation process](#) (eliciting ‘feedback’ from just 134 people), and long (but unpublicised) monologues from Dr Nelson [in Senate Estimates \(for example, pages 113-14 of the Official Hansard\)](#). The future of the Memorial is being settled in the shadows by a small group.
57. That having been said, the documents so far released still deserve close analysis. That is what this paper does.

Approval processes and the gathering of evidence

58. The *Design Options* paper says:

2.1 IBC [*Initial Business Case*] Submission and Approved Options

The IBC was submitted to Government for consideration in October 2017. Government approved two design options from the IBC to be further developed as part of the DBC [*Detailed Business Case*]. Both designs have been modified to improve value for money.

59. There is no indication of what ‘submitted to Government’ actually means in this case. Normally, for a project such as this, it could mean either Cabinet or the Parliamentary Standing Committee on Public Works (PWC). The Memorial needs to provide more information to enable the public to determine what real government imprimatur for the project has actually been received. At the launch of the project on 1 November 2018, [the then Prime Minister said this](#):

The Memorial has been exploring, with support from our Government, with [sic] options for redevelopment ... [O]ur Government is supportive of these plans ... So today I am pleased to announce the Government is backing these plans, providing \$498 million over the next nine years to see these plans fulfilled.

60. At what level of the Government was the proposal approved: Cabinet? exchange of letters? Captain’s Call? Did the expenditure go through the normal testing of the Budget process, New Policy Proposals and so on, or did it get an inside track? If the funding went through the Budget process, why was it announced in November 2018 rather than in the Budget five months later? If it is the case that [Labor supports the project](#), which version of it did it support? (In May 2018, [Director Nelson told Senate Estimates](#) that officials had ‘spoken to the Leader of the Opposition about it, but not in full detail, shall I say’: page 114 of the Official Hansard.) We are not told any of these things.

61. [Department of Finance rules \(para 77\)](#) require a cost confidence level of 80 per cent (P80) for the project costing estimates in the *Detailed Business Case* to be acceptable for submission to Government after Stage Two of project development. This is clearly acknowledged in the covering note to the *Design Options* paper under the heading ‘Background’.

62. For *Stage One* (which provides funding to allow the development of Stage Two for the selected option or options), however, only a P50 Confidence level is required. That means confidence of 50 per cent that the cost estimates will not be exceeded in the final work.

63. Since there is [no record of Stage Two approval having been submitted to the Public Works Committee](#) for consideration by the time the 45th Parliament was dissolved on 11 April 2019, it appears that government approval for funding was given based upon documentation developed only to the P50 level.
64. It is somewhat cavalier to approve a budget of \$498 million on the basis of only a 50 per cent chance of the project being completed within budget.
65. Examination of the *Options Assessment Report* suggests that remarkably little reliable evidence was gathered during the *Report's* preparation. In fact, the *Report* can be read as nothing more than a detailed (though loosely accurate) statement of a predetermined position requiring 'validation' through a consultant's report.
66. In other words, the answer was written before the questions were asked.
67. It is axiomatic that an organisation does not engage consultants to prepare reports of this nature unless it has a clear vision both of what it requires the consultant to come up with *and* the mechanism to ensure this conclusion is reached. The *Options Assessment Report* appears *prima facie* to be an example of that truism. This is further discussed below.
68. However, before further examination of the *Report*, some general comments are in order.

[Use of the terminology 'business case' and 'metric'](#)

69. The [Australian War Memorial Act 1980](#) makes no reference to 'business' as a function of the Memorial. Indeed, many people would consider it inappropriate and disrespectful to even use the term 'business' to refer to the functions of the Memorial.
70. Since the Memorial is using the terminology 'business case' in its explanation of the supposed need for this major project, however, it is important for it to provide the metric or metrics used in the business case and by which the project is justified. If the metrics cannot be unambiguously defined, the apparent level of assurance (derived from basing the development on a 'business case') collapses.
71. The term 'metric' in its business use means a set of figures or statistics that measure results. As with the use of 'business case', the use of 'metric(s)' would ordinarily lend rigour to a report, because it indicates the adoption of objective and measurable values.
72. The *Options Assessment Report*, section 2.3, 'Criteria', states, 'The criteria and assessing metrics used to evaluate each option considered are outlined in Table 1'. Table 1 then follows.

Table 1 Compulsory Criteria

Objective	Criteria	Metrics
Business Need	Operate as the National Memorial	Support the Memorial to function as the National Memorial commemorating the sacrifice of Australians
Business Need	Access to the Memorial	The proposed solution provides for appropriate levels of access to the Memorial's exhibitions and services
Business Need	Safe and secure	The proposed solution enables the Memorial to provide the necessary levels of safety and security appropriate to both the Collection and to the national significance of the Memorial itself
Business Need	Capacity and Capability	The proposed solution provides adequate space, for current requirements (nom. 10,000 m ²), for the Memorial to provide suitable [sic] which speaks to the Australian experience of past, present and future conflict, peacekeeping and humanitarian operations

73. An examination of Table 1 shows clearly that only one of the alleged 'metrics' used for assessment of the options is in fact a metric. The others are not metrics at all but objectives (or goals or targets or aims) for the Memorial. There are, in fact, no actual metrics in Table 1, other than against 'Capacity and Capability', where the 'nominal' area of 10,000 square metres appears as a target for what is nebulously stated as 'adequate space, for current requirements'. That formulation seems to mean 'the space we guess we will need in the foreseeable future'.
74. The assessment of the degree to which various listed options meet these objectives (or goals or targets or aims) is obviously subjective, in the absence of any measure for quantifying the degree to which the objectives have in fact been reached. It should be strongly noted, also, that the development of a scoring system for tabulation and comparison of options does *not*

represent a metric: a subjective assessment cannot be mathematically evaluated against a statement of requirements that itself relies on subjective values.

75. In this case, the Memorial's consultants used a subjective measure to determine success against another subjective measure. The striking use of colour in the *Report* (red for Very High Risk, orange for High Risk, green for Medium [Risk, presumably], blue (though, apparently carelessly by the authors, green at one point) for Low Risk, cannot disguise this basic flaw.
76. In fact, the only actual metrics identified in the *Report* other than for the nominal space requirement of 10,000 square metres are those for 'reasonable distances' (section 2.5). These are given as: 'reasonable walking distance: 400m' which is described as 'the industry benchmark', though what industry is not stated. 'Reasonable assisted travel distance: 2 km' has been selected by the consultants and described as 'considered reasonable. This distance would not deter visitors from travelling on to a second location for more exhibitions.'
77. The selected metric for 'reasonable assisted travel distance', while not supported by any 'industry benchmark', places the Memorial conveniently just within the limit for proximity to the Civic Centre bus and light rail hub.

Exhibition, visitor and storage space requirements

78. There are many standards which impact on the design, construction and use of any public institution such as the Memorial. These standards provide a wide range of technical metrics, for example, the number of visitors allowable within a space, the capacity and availability of fire exits, disabled visitor access and mobility, floor loadings, ventilation standards, and so on.
79. These technical standards are largely missing from the *Options Assessment Report*, though they start to appear in the *Design Options* paper. The *Report* in particular contains many references, both obliquely and overtly, to space requirements, but at times in highly emotive terms, for example:

As the Memorial cannot address critical space shortages, the Do Nothing option would not allow the Memorial to continue to operate as a shrine, world-class museum and an extensive achieve [sic, presumably 'archive'] (section 3.1).

80. There seems to be no justification provided at any point to support this assessment; it is presented to the reader as an article of faith, not to be questioned or tested.
81. It is not the role of the current paper to examine, let alone either contest or support, this most basic of assumptions, one that is presented as the overarching reason for embarking on the project. Yet, there remains the crucial point that expenditure of the magnitude suggested

should be supported by a robust and reliable presentation of the reasons for it, not just a simple statement of belief.

82. Equally, the ‘nominal’ space requirement of 10,000 square metres for the expansion of exhibitions is entirely unsupported by reasons why this is an appropriate figure, or with information about the use that would be made of this space, beyond the generality of telling ‘the story’ (section 3.1 and elsewhere). That, in turn, opens a number of issues, including what story or stories should be told and how.

83. [The Memorial’s promotional video](#) depicts a number of aircraft located in generous space. How many of the stories are about these space-gobbling machines? [In Senate Estimates in February 2018](#), Dr Nelson listed some of these machines (page 114 of the Proof Hansard):

We’ve got a CH-47 that’s come in; we’ve got a Sea Hawk; we’ve got a Squirrel; we’ve got a Black Hawk; we’ve salvaged big things off Sydney (IV) and from Tobruk; we’ve got a P3 Orion; we’ve got an F/A-18; we’ve just corrected an historical anomaly and acquired an F-111.

84. Given that the Memorial has all these large machines and has to find space for them, does the space *come before* the stories? In other words, was the space requirement decided on the basis of the size and number of machines needing accommodation, before attention turned to the stories that might be told?

85. Without a supporting case, the nominal figure for space requirements can be considered an ambit claim at best. And the subsidiary claims for increased visitor access space, and so on, are obviously related to the basic claim for exhibition space. These claims are only meaningful if the basic exhibition space claim is supportable.

86. Then, how does the financial aspect of the project connect with the assessment of space requirements? This is a crucial point. The fact that a budget of around \$500 million was being discussed publicly in April and May 2018, and had been announced by the Prime Minister on 1 November 2018 (see above para 59), still before the ‘80 per cent’ *Detailed Business Case* had been completed – it was 21 December 2018 before the *Detailed Business Case* went to the Government (above para 47) – suggests that the space claim was developed as a ‘What can we do with this budget?’ exercise. In other words, that the dollar figure came first.

87. What is the evidence for this? [Senate Estimates from 30 May 2018](#) shows that a \$500 million or so figure was very much in the public domain then (page 113 of the Official Hansard):

Senator GALLACHER: Dr Nelson, you’ve been advocating an ambitious business case for the Australian War Memorial, and a \$500 million figure has been reported. Is that correct? Is that accurate? ...

Dr Nelson: Until the process is completed, Senator Gallacher, we don't know precisely what it will cost. We saw reports in the media, as you suggest, of \$500 million over seven years ...

88. The [earliest media reports](#) of the \$500 million estimate date from early April 2018, three months before the Memorial Council agreed on Option 1 after considering the *Decision Options* paper. [An ABC report dated 7 April 2018](#) refers to '[d]raft architectural plans', presumably shown to Andrew Greene, the journalist who wrote the story. It seems clear, then, that space requirements were still being considered, and options being weighed, in early to mid-2018 at a time when the \$500 million estimate was in the public domain, perhaps because of a leak from [the Interdepartmental Committee chaired by Dr Nelson](#) (page 114). There was certainly scope to adjust the plans in the light of information about how much money was likely to be available.
89. What is the position now, in May 2019? The fact that [the Forward Estimates now contain parts of that eventual \\$498 million](#) under 'Capital measures' (rounded: 2019-20: \$26.2m; 2020-21: \$36.7m; 2021-22: \$31.6m; 2022-23: \$65.6m) (page 92), does not of itself mean that the figures are soundly based or set in stone.
90. In any case, [the Appropriations Bills linked to those estimates lapsed at the dissolution of the 45th Parliament](#). If the Coalition is returned at the election, the Bills will be reintroduced; if there is a new government, there will be a revised Budget.

[Practical considerations for multi-level and subterranean exhibition space development](#)

91. The preferred option (Option 1) of replacing Anzac Hall with a two-level structure (of which one level would be substantially if not completely underground) is an extremely poor idea. It is costly, cumbersome and fraught with unnecessary risk factors.
92. Large Technology Objects, particularly large weapons, armoured vehicles and the like, are almost without exception heavy or extremely heavy, with very high point loadings. Even aircraft often have considerable point loadings, are extremely awkward to manoeuvre in tight spaces, and are highly susceptible to damage while moving.
93. The people tasked with the movement of Large Technology Objects into enclosed spaces have to be aware of not only the load and movement peculiarities of the objects themselves, but also the additional loads and space requirements for the equipment that is needed to move the objects. For example, a tank weighing perhaps 30 tonnes (as a stripped-out exhibit item) cannot be manhandled into place on its tracks.
94. A two-storey version of Anzac Hall, with the lower floor underground, is perhaps the worst configuration possible for flexible exhibition space development.

95. Any exhibition space intended for objects of much larger size and weight than around that of a conventional passenger car will need multiple access points of large dimension. Furthermore, the need to rotate the placement of those objects requiring removal for off-site maintenance or restoration means that a single access point is, in the longer term, entirely impractical. Without multiple access points it becomes very difficult to move Large Technology Objects around.
96. Then, if the space is underground, such access will require either extremely large lifts or large and gently sloped access ramps, which will impact on the surrounding Memorial space.
97. On the positive side, however, a lower-floor space for Large Technology Objects will allow for a clear span, high strength slab floor suitable for the loadings imparted by these objects, provided the upper floor (the one at ground level) is restricted to displaying low-weight exhibition objects. If more flexibility is required for the display of Large Technology Objects on the upper floor, it is extremely likely that the lower floor will have to be intersected with load-bearing columns, severely restricting that floor's utility for the display of Large Technology Objects.
98. As a further consideration, it is accepted wisdom among museum professionals that any museum space which does not have decent *natural* drainage will, at some time, experience flooding, whether from natural causes, mechanical failure of infrastructure, or human error. This is obviously a bigger problem if a floor is underground.
99. Any underground exhibition facility is inevitably a compromise – or collection of compromises – that introduces a potential future situation requiring remediation that is almost always highly expensive, often hazardous and sometimes impossible.
100. If these factors are ignored and the attendant risk not recognised within the evaluation matrix, then any such option is not being presented honestly or accurately.

Examination of the available documentation for reliability, veracity and objectivity

101. The documents released derived from the work of professional consultants and Memorial staff over a number of years. In February 2018, [Director Nelson said in Senate Estimates \(page 114 of the Proof Hansard\)](#) that 'three years ago, we asked our architects to have a look at this and do some design work for an expansion of the memorial's footprint'. That would make it early 2015 when ideas began to take shape.

102. According to [Director Nelson at Senate Estimates in February this year \(page 154 of the Official Hansard\)](#), the *Detailed Business Case* was delivered to the Government on 21 December 2018, prior to the provision of construction funding in the 2019 Budget, though after the project launch in November 2018. (Dr Nelson also said ‘that is a part of the cabinet-in-confidence process. That’s a government document. It’s a matter for the government to make a decision about it.’ What decision could he have been referring to, when the Prime Minister had announced funding in the previous November?)
103. To evaluate the reliability, veracity and objectivity of the *Detailed Business Case*, it is reasonable to sample the documentation supplied. If that sample indicates deficiencies, then it follows that the *Detailed Business Case* is flawed, because not all options have been presented fairly for consideration.
104. The following is an examination of the option in section 4.2 of the *Options Assessment Report*, namely ‘Utilise the Memorial's Mitchell Facility’, commencing on page 9 of the *Report*. The *Report* dismissed this option.
105. The reasons for excluding this option from further consideration are highly suspect. Indeed, the work does not comply with the [Department of Finance rules for the Initial Business Case \(para. 71\)](#): ‘All options considered in the IBC must be comparable and assessed objectively and consistently’.
106. In the following paragraphs a quote from section 4.2 of the *Report* (page 10) is followed by a comment. (The quotes are in italics and paragraph numbers have been added to them for ease of reference.)

From section 4.2

107. *This options [sic] fails to meet the user requirements, as the collection is disbursed [sic] across multiple sites, outside of the reasonable distances however still within the ACT, resulting in a diminishing effect on the existing site and the existing collection. The reduction in objects and stories at the Memorial in Campbell would adversely affect annual attendance.*

Comment

108. The dispersal of the publicly accessible Memorial collection between the Campbell site and the Mitchell Treloar site has been a fact since around 1994, following the opening of the Mitchell Treloar facility.
109. Memorial Annual Reports include visitation to the Treloar Centre within the performance metric as a positive factor in terms of access to the Memorial’s collection. The negative expression in the *Options Assessment Report* has only emerged to support the

proposition that incorporation of the Mitchell site facilities as an exhibition space detracts from the Memorial's current preference for centralisation at the Campbell site.

110. **Thus**, the *Options Assessment Report* conclusion is contradicted by the Memorial's previous reporting practice.

From section 4.2

111. *The dispersed Memorial would result in the Memorial at Campbell not being considered as Australia's "national" War Memorial, thereby lessening the importance of the Campbell site and commemorations told within [sic].*

Comment

112. Display of the Memorial's National Collection artefacts is only one of the three roles of the Memorial as defined in the introduction to the *Options Assessment Report* (section 1.1):

The Memorial is unique in that it is a shrine, a world-class museum and an extensive archive covering Australia's involvement in conflicts. This is achieved in three parts:

- A Commemorative Area (shrine) including the Hall of Memory with the Tomb of the Unknown Soldier; [Sic: The correct title is the Tomb of the Unknown Australian Soldier and the difference is not in any way immaterial. A conscientious consultant would have avoided this error; an alert client would have corrected it.]
- The Memorial's galleries (museum); and
- A Research Centre (archive).

A critical element of the function of the Memorial is that it is capable of continuing to allow all three functions to continue within the same precinct.

113. **Thus**, the *Options Assessment Report* conclusion is inconsistent with its description of the Memorial's unique character. Development of the Mitchell site would have no impact on the first and third of these three parts.

114. As for the stated 'critical element' of co-location, as noted above (para 109), the Memorial has been including visitation to its Treloar Centre (Mitchell) to view Large Technology Objects as an integral part of its annual operations (recently, [the 'Big Things in Store' open days](#)) for more than two decades. See, for example, [the Memorial's Annual Report for 2017-18](#) (page x): '1.089 million visitors to the Memorial's Campbell site or Mitchell storage facility'. The role of the Mitchell facility is set out in the same report (page 3):

When complete the redeveloped storage will not only safeguard our National Collection and preserve the stories of serving personnel and veterans, but will enable the Memorial to collect significant land, sea, and air artefacts currently being retired by the Australian Defence Force.

115. The preceding paragraph sounds rather like the argument for the extension to the Campbell site (see above para 83). [The 2017 Public Works Committee report \(sections 2.10-12\)](#) on the now completed works at Mitchell reinforces this impression. The report notes that the Memorial had to find space for an FA18 fighter-bomber, two helicopters, an Orion aircraft, and two large land vehicles. The Mitchell project was for ‘approximately 5,288 square metres of total floorspace for the storage of ... primarily military aircraft and large military equipment such as infantry mobility vehicles handed over from the Department of Defence as the equipment is retired from service’. There would also be ‘residual storage capacity of 3,433 square metres, which would give the Memorial ‘a forward storage capacity of around 8.6 years’.
116. Again, the Memorial’s commitment to take on retired military machinery forces it to seek ever more space to store and display it. Another approach would be *not* to take the machines – or not to take so many of them – or to invest in digitisation.

From section 4.2

117. *The Mitchell storage facility is not common knowledge and is not currently open on a regular basis. Utilising this facility will require additional operational costs to the Commonwealth to support dual facilities, given their location separation.*

Comment

118. The Treloar Centre at Mitchell was *specifically* developed as a world-leading quality storage and visitor-accessible facility, as is evidenced by the visitor galleries being separated from the actual storage area. It has all the required features – visitor access, visitor safety, etc. – for use as a daily visitation area.
119. Not using this space is a management decision, not driven by a restriction on the capability of the facility resulting from its physical characteristics. It may be the result of a Memorial decision to centralise all visitation on the Campbell site. Moreover, if the Mitchell precinct is not well known after more than 20 years, then that is to the discredit of Memorial management and, in fact, contravenes the terms of [the Public Works Committee’s 1992 approval of funding for the construction of the Treloar Centre](#).

120. Additional exhibition and visitor movement space at any facility for the Memorial will entail additional operational costs to the Commonwealth, simply on a ratio of visitor safety and monitoring of security, etc. to the area. It is accepted that a discrete facility at Mitchell would incur additional cost over the ‘economies of scale’ of extension of the central Memorial facilities, but this cost should be considered within the ambit of the overall operational costings of all the options, not taken as a unique cost imposition that disqualifies the Mitchell option.

121. *Thus*, the *Options Assessment Report* analysis of this option is at best selective and not considered within the context of the total costings of any option.

From section 4.2

122. *The Mitchell site is not located within close proximity to a significant transportation hub, which will impact attendance.*

Comment

123. The Memorial’s Campbell site is located approximately 1.8km line-of-sight from the nearest ‘significant transportation hub’ (Civic Centre). A foot or vehicle path between the Memorial and that centre would likely exceed 2km. In the *Options Assessment Report*’s terms, 2km is a ‘reasonable assisted transport distance’.

124. The Mitchell site, on the other hand, is located within 50 metres of the Canberra Metro (Light Rail) line, and approximately 700 metres from the Flemington Road-Well Station stop. With the commencement of the light rail service, Mitchell will be better served for transport from the City Centre transport hub than is the Memorial itself.

From section 4.2

125. *By dispersing the objects, the stories and messages are lost and do not appropriately commemorate Veteran services [sic].*

Comment

126. This is an utterly subjective and unsupportable assertion. If it is accepted as true, however, it means that every local memorial across the nation and worldwide is of no value. In particular, it makes the Sir John Monash Centre in France, more than 15,000 km away in France and costing \$100 million, worthless as a commemoration of Australian service.

From section 4.2

127. *This option is inconsistent with Charles Bean's vision for the Memorial, failing to enable it to appropriately tell the stories of Australia's involvement in conflict.*

Comment

128. With a few exceptions, the physical location of an artefact neither enhances nor diminishes the understanding of the experience of war. Exceptions would obviously include personal effects of individuals whose stories are used for deeper understanding. Technology objects (large or otherwise) that are merely illustrative examples do not necessarily need to be placed near the main 'stories' if they are not essential to or referenced in those stories.

129. **Thus**, this is not relevant as a reason to reject the option

From section 4.2

130. *This option does not support the Memorial to function [sic] as the National Memorial commemorating the sacrifice of Australians.*

Comment

131. This is an entirely vacuous, meaningless and valueless assessment without explanation of why the assessment is made. It is indicative of a predisposition to express pejorative opinions towards options that do not support the desired conclusion.

From section 4.2

132. *This option is not considered a viable long term solution.*

Comment

133. No supporting reasons are provided. This is simply an expression of opinion without any evidence.

From section 4.2

134. *This option is inconsistent with the options outlined within the Mitchell storage facility IBC and Detailed Business Case (DBC), contradicting past government approvals.*

Comment

135. [The Treloar Centre building was approved by the Public Works Committee in 1992](#) as a combined, very highly environmentally-enabled storage and conservation facility with

integrated visitor access capability, as witnessed by the observation gallery, visitor foyer, visitor safety, and disabled access capability.

136. The Memorial has acquired a number of areas adjacent to the existing Mitchell Treloar Centre and Large Object storage facility (now called ‘Treloar A, B and C’) as detailed in the Memorial’s [*Treloar E Large Technology Objects Store Project: Statement of Evidence to the Parliamentary Standing Committee on Public Works*](#), Submission 1 to the Public Works Committee inquiry in 2017.

137. The availability of such a large adjacent area that has already been partially developed to serve a major part of the Memorial’s activities offers exhibition development options that deserve close consideration. Moreover, the lack of recognition of the original role of the Treloar Centre, as approved for construction by the Public Works Committee for combined storage and exhibition use, is a clear example of ‘contradicting past government approvals’ (see para 134 above).

From section 4.2

138. *The travelling exhibition requires the Commonwealth to provide additional operational costs (movement of memorial items), funding for leases, increase [sic] insurances, increased maintenance and the like.*

Comment

139. This is entirely irrelevant to the consideration of the Mitchell facility option and is most likely an example of invalid composition or editing by the author or authors of the *Report*.

140. The *Report* is riddled with literals (see the number of ‘sic’ references above) and shows signs of hasty composition by its authors and slipshod checking by its clients at the Memorial. Even at this level it was not a good investment.

From section 4.2

141. *By dispersing the objects across Australia, the stories and messages are lost and do not appropriately commemorate Veteran services [sic].*

Comment

142. As for the previous comment: irrelevant and invalid for the option under consideration.

The *Design Options* paper and scoring the final four options

143. This paper has already covered (see above paras 52-57) the crucial question of how Anzac Hall came to be deleted from the preferred option (Option 1). There remain some comments to be made about the scoring method by which Option 1 emerged on top.
144. Pages 11 to 18 and Attachment F of the *Design Options* paper discuss four options: Option 1, Replacement of Anzac Hall; Option 2, Northern Above Ground Expansion; Option 3, Eastern Below Ground Expansion; Option 4, Western Above Ground Expansion. The options were assessed against three categories of criteria: Technical; Financial; Project Objectives. Scoring was weighted between categories and within categories. Consultants and senior Memorial staff did the scoring. Discussion of the risk, operational impact, and land value aspects of Option 1 occupied barely half a page of the paper.
145. It would be possible to analyse the analysis in detail, to quibble over the weightings, and question the allocation of scoring tasks between consultants and Memorial officers. It is sufficient, however, to focus on the table on page 16 of the *Design Options* paper labelled ‘Assessment Criteria Summary’. Option 1 comes out ahead of the other three options. There is no surprise in this; the process would have been tailored to produce this outcome, given what those designing and implementing the process knew of views on the Memorial’s Council.
146. What is notable, however, is the meagre scores tallied. Option 1, the preferred way forward to spend \$498 million, scored only 57.67 ‘Total Weighted Score (out of 100)’. That is hardly a ringing endorsement.

Conclusions

147. The Australian War Memorial belongs to the whole nation, but its future is being settled in the shadows by a small group. The deletion of Anzac Hall, late in the process and for obscure reasons, is symptomatic of a flawed process.
148. The Memorial’s future space requirements are vaguely expressed – essentially an ambit claim – and seem to be driven mainly by the need to find space to ‘park’ superannuated military equipment taken on from the Department of Defence. (The need to provide recent veterans with a ‘therapeutic milieu’, [sometimes stressed by the Director of the Memorial](#), appears nowhere in either of the documents released.)
149. The treatment of the options lacks assessment against metrics, but is subjective (including a subjective assessment against subjective criteria) and often emotive and evidence-free. The *Options Assessment Report* is a good example of a consultant’s report prepared to fit a predetermined conclusion.

150. The space requirement estimate may have been influenced by knowledge of how much funding was likely to be available for the project. Subsidiary space estimates are flawed because they flow from a flawed estimate for exhibition space.
151. The ‘new’ two level Anzac Hall is an extremely poor idea, fraught with difficulties regarding point loadings, access and drainage.
152. A case study of the *Options Assessment Report*’s treatment of options (looking at the option to use the Memorial’s Mitchell facility) shows the *Report*’s work is highly suspect and fails to meet Department of Finance criteria that options ‘must be comparable and assessed objectively and consistently’.
153. It is not surprising that, scored against a matrix of criteria, the ultimately preferred option (including deletion of Anzac Hall) scored only 57.67 points out of 100.

Heritage Guardians
14 May 2019

Heritage Guardians: coordinating community action on the War Memorial extensions

‘[It should] ... not be colossal in scale but rather a gem of its kind’ (Charles Bean and the Australian War Museum Committee, 11 October 1923, on the proposed building and collection)

[The campaign diary of the Heritage Guardians campaign against the War Memorial extensions.](#)

Anzac Hall – timeline on AWM decision to demolish

Summary

In 2017 AWM Council approved the Johnson Pilton Walker Building Concept Masterplan which adaptively reused Anzac Hall and was costed at \$349M. This Masterplan was significantly amended by GHD Pty Ltd in 2018 without the agreement of JPW. The new plan, which included demolishing Anzac Hall, was accepted by AWM Council without apparent consideration of heritage impact. The AWM presented the revised development to Parliament in November 2018. A 'new Anzac Hall and Atrium' was subsequently a condition of the 'reference design' in the AWM's *Expressions of Interest for Architectural Design Services* published February 2019.

Timeline

1. JPW Building Concept Masterplan - 14 November 2016

This is the original JPW site development concept which retains Anzac Hall and has minimal impact on the heritage attributes of the site. It relates well to the site as a whole and was endorsed by the AWM Council in early 2017. It was costed by quantity surveyors WT Partnership at \$349M (2016), and engineering reviewed by Taylor Thomson Whitting. All have significant experience on the site.

2. GHD Options Assessment Report - 18 August 2017

This AWM document looks at options for development of the AWM. Some options and their assessment are questionable. Increased display space is the driver for the proposal - not capability of the site to handle expansion (this is one of the key criticisms of the AWM development from the Australian Heritage Council). However the 2016 JPW Building Concept Masterplan proposal is established as 'low risk' and is recommended as a masterplan that provides the extra space sought by the AWM whilst protecting the heritage attributes of the site. Any options that 'dispersed' the collection were automatically rejected - so, unfortunately, putting most Large Technology Objects (LTO) at Treloar was never considered (the JPW concept did accommodate some LTO at Campbell) — an apparent contradiction to this 'policy' is the AWM's 2013 Masterplan for the Treloar site. It has LTO public display options there, and land purchases and development at Treloar since supported this concept. It is notable that the AHC specifically advises that the increased display of LTO at Campbell cannot be achieved without significantly impacting listed heritage values.

3. AWM Council meeting 161 - 3 July 2018

This is when the concept of demolishing Anzac Hall is formalised. The JPW Masterplan is 'amended' (without their support) and Anzac Hall is now to be demolished. At Option 1 GHDWoodhead Architectural proposes the demolition of Anzac Hall and replacement with a new building and the atrium. There are a range of other clearly unsatisfactory options and the 'amended' JPW concept as Option 1 is recommended to AWM Council. Council appear

to have accepted it without considering issues related to the AWM Heritage Management Plan (which specifies retain Anzac Hall) and the Memorial's National Heritage listing.

4. Development proposal is presented at Parliament House - 1 November 2018

Heritage impact including the loss of Anzac Hall was not explicit in the presentation and the replacement Anzac Hall and atrium was presented as a fait accompli and the only option.

5. Architectural Design Services. Request for Expression of Interest - 13 February 2019

The EOI states that the Australian Government approved the AWM redevelopment project on 1 November 2018. This ignores the unfinished role of PWC, DAWE and the NCA and clearly states the AWM requirement for the demolition of Anzac Hall and the glazed link.

From this document:

- *Attachment A - Project Scope and Brief 7.1 Reference Design Outcomes a) New Anzac Hall b) New Glazed Link c) CEW Bean extension [but only to the East at this point — significant expansion of this comes later, as did expansion of the Parade Ground and the new eastern carpark].*
- *Attachment A - Project Scope and Brief 7.3 Reference Design Works Components 'The reference design approved by Government includes six works components' a) New Anzac Hall and Atrium [etc]*

The document also has a number of 'motherhood' statements related to heritage (which are not achieved in the actual proposal and are raised by the Australian Heritage Council):

- *Attachment A - Project Scope and Brief 3.3 Site Development Requirements 'A key guiding principle is that the Memorial's main building itself should dominate as part of a simple landscape setting; and that any developments within the precinct should not challenge this'.*
- *Attachment A - Project Scope and Brief 7.8.1 Design Outcome Overview 'The new Southern Entrance will address the capacity, accessibility and security restrictions of the current entrance: Noting the heritage requirements result in very low tolerance for change being made to the view of the Main Memorial Building from Anzac Parade, developing a new entrance at the front of the building creates both design and integration challenges'.*

4 February 2019

The Hon. Darren Chester MP
Minister for Veteran's Affairs
Parliament House
CANBERRA ACT 2600

Dear Minister

Proposal for major redevelopment of the Australian War Memorial

I write in reply to the letter from your Department dated 14 January 2018 (your reference MC18-003675) responding to my letter to the Prime Minister dated 19 October 2018.

Thank you for the response. However, I must respectfully say the turnaround time was overly long and I felt content relating to the history, character and role of the Memorial was unnecessary given my previous experience and seniority there.

As you are aware there is currently much discussion in the professional and wider community about the proper development of the Memorial. Your letter raises issues relevant to that discussion and I would appreciate your response to the following:

1. With regard to the nature of the consultants engaged I'm interested in what constitutes "highly experienced architectural, engineering and heritage consultants". For example, what world class architecture have they created; are the heritage consultants independent of the architectural consultants; what previous experience and understanding do they have of the Memorial's long established development planning, heritage management, and building and site circulation issues?
2. I see on AusTender that GHD Pty Ltd was engaged in January 2018 until December 2018 for Building Support Services – for the development of the *2nd Pass Business Case for the AWM Master Plan*. I note the original contract value of \$401,500 was amended on 20 July 2018 for *Approval for stages 2 & 3* to a new contract total of over \$8 Million. What additional work does this extraordinary increase cover particularly as your letter indicates "As the project moves from a Detailed Business Case (DBC) to a delivery phase, a new team of consultants will be selected through another round of tender processes".
3. You indicate that "The development of the business case for the redevelopment included an exhaustive analysis of design options for the redevelopment" and that the proposed option to demolish Anzac Hall "...was not an option that was pursued lightly". I am interested in this statement as I am aware there were multiple options produced (by GHD) and only one of these involved the removal of Anzac Hall. I am also aware that there are other existing schemes for the redevelopment of the building and site that provide similar or greater floor space and do not involve the removal of Anzac Hall or include new intrusive site elements such as the proposed new rear atrium/building option. I would also question your statement that the retention (and modification) of Anzac Hall would cost tens of millions of dollars more than the proposal to remove it. I suspect this is more indicative of flawed design

alternatives and/or the allure of a greenfield development without the difficulty of existing buildings or infrastructure.

4. I would also dispute your belief that the option that demolishes Anzac Hall (which as you know won the highest awards for architecture in this country) and its replacement by another building and atrium connected to the Main Building does not have, will not have, or is not likely to have a significant impact on the National Heritage values of the Memorial as a National Heritage place.
5. You indicate that the Director of the Memorial chaired an Interdepartmental Steering Committee comprising senior officials from selected Commonwealth agencies and that this Committee supported the option to demolish Anzac Hall. I would be interested to know what Departments were included on this committee. In particular, did it include a representative from the Department of Environment and Energy with specialist knowledge of the EPBC Act and, if so, was there confirmation from them (and the National Capital Authority) to the Steering Committee that the removal of Anzac Hall option would be acceptable and should be pursued?
6. Further to point 5, is it the intention of the Memorial to make a formal referral of the proposal to the Environment Minister for assessment under the EPBC Act? Clearly the action proposed has the potential to have a significant impact on National Heritage values of the site and therefore it should be referred as a matter of course.
7. You also mention that the “proposed current design represents the best outcome from a holistic project perspective.....” and the “...best outcome for the Memorial’s long term future and best value for the taxpayer”. I would question that there is a holistic approach to the project when it is proposed to move to a new team of consultants for the delivery phase. Presumably the expectation is for the new consultants to align themselves with the previous consultant’s concept designs. This is a highly unusual approach for the delivery of quality architecture and I expect would limit responses to the tender. Leaving aside the irregularity of changing design consultants mid-project (unless they are incapable of completing the design), I would also question the intention to compartmentalise the project and tender as separate elements (your letter mentions tender processes). This piecemeal approach raises significant concerns about the ability to deliver a well conceived and cohesive design. This type of approach does not seem conducive to achieving “best outcome” and “best value”.

Finally, as you mention providing facility for the “Invictus Generation” and “those who will follow in their footsteps over the next 50 years” I raise again the point I made in my previous letter: *The Memorial can be sensitively developed, but this must be based on a long term approach to the role of the heritage building and how we view commemoration occurring on that site for the next 50 to 100 years. Simply increasing gallery space in the heritage building as the need arises does not address the complexities of ongoing commemoration, and the constraints of the heritage building and site over time.*

Yours sincerely

Stewart Mitchell

Dr Brendan Nelson
Director



8 March 2019
EXEC10041-008588

Mr Stewart Mitchell
84 Creswell Street
Campbell ACT 2612

Dear ~~Mr~~ ^{Stewart} Mitchell,

The Office of the Minister for Veterans' Affairs, the Honourable Darren Chester MP, has referred your letter of 15 February 2019 regarding the redevelopment of the Australian War Memorial to the Memorial for response.

Your letter raises a number of queries relating to the experience of the consultants engaged throughout the redevelopment project to date. Given your previous career as an APS employee, you will be well versed in the Commonwealth procurement policy to which the Memorial must adhere. It should not then surprise you that these requirements were applied to all related procurement activities. I am confident that the expertise of the staff responsible for these processes ensured the highest quality outcomes.

Additionally, you have queried the individual representation on the Interdepartmental Steering Committee; which comprised of senior representatives of central Government agencies appointed by that agency's Secretary. In particular, it included the Chief Planner of the National Capital Authority, so you may be assured that the Committee and the Memorial is well versed in its obligations relating to the Environment Protection and Biodiversity Conservation (EPBC) Act and heritage considerations.

The redevelopment project fully intends to make the appropriate submissions to the Minister of the Department of the Environment and Energy, and the Public Works Committee (PWC) in relation to all proposed works at the Memorial. That it has not done so to date merely reflects that the project has only recently completed the Detailed Business Case and is now in the process of selecting and appointing the project team.

I thank you for taking the time to write about your concerns and assure you that the Memorial will not only achieve a sensitive redevelopment; it will enhance the Memorial's reputation as a world class museum and centre of historical and commemorative excellence. Most importantly and above all, it will enable the Memorial to tell the stories of men and women of the past thirty years who have given their all for our nation.

Yours sincerely,


Brendan Nelson

Here is their spirit in the heart of the land they loved; and here we guard the record which they themselves made. C.E.W. Bean

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The Australian War Memorial Development Program: the ‘Mitchell Option’ reassessed

Richard Llewellyn*

Contents

Earlier papers relevant to Heritage Guardians campaign against the extensions	2
Executive summary	3
Introduction	6
Source documentation	7
The genesis of the Treloar Centre	8
The Memorial’s case for space	10
The potential for flexibility: Campbell vs Mitchell sites	14
The ‘Campbell Redevelopment’ plan: the objectives, claims and figures do not mesh	15
Does the ‘Campbell Redevelopment’ option provide flexibility?	17
Does the Campbell site option deliver core needs for the Memorial?	18
The ‘Mitchell Option’	20
The potential of the Mitchell Precinct for increased visitor access to the National Collection	21
Principle 1 – Whole of Institution Consideration	21
Principle 2 – Maximise Site Usage	22
Principle 3 – Design Flexible Building Storage Form	22
Principle 4 – Design Flexible Building Storage Form [sic]	22
Principle 5 – Organise around shared infrastructure and support facilities	23
Principle 6 – Standardise Ground Floor and Future Connections	23
Principle 7 – Environmentally Sustainable and Responsible Design	23
Principle 8 – Develop Precinct Wide Services Strategy	23
Principle 9 – Strengthen Public Presence	24
The issues of transport	24
Conclusion	26
Appendix: Significant factors in Large Technology Object (LTO) exhibition and storage	27

* Richard Llewellyn held the senior position of Registrar at the Australian War Memorial from 1986 to 1995. This paper has been prepared with the assistance of Brendon Kelson, former Deputy Director (1981-90) and Director (1990-94) of the Memorial, and David Stephens, member of Heritage Guardians and editor of [the Honest History website](#).

18 July 2019

Earlier papers relevant to Heritage Guardians campaign against the extensions

For earlier papers, see [the campaign diary of the Heritage Guardians campaign against the War Memorial extensions](#). In particular, see:

- [open letter \(March 2019\) signed by 83 distinguished Australians against the extensions](#);
- [petition \(April 2019\) signed by 1246 Australians against the extensions](#);
- [David Stephens in *The Riot Act* \(15 April\) summarises the arguments against the extensions](#);
- [Paul Daley in *Guardian Australia* \(22 April\) says major parties were conned into supporting the extensions](#);
- [Ben Brooker in *Overland* \(23 April\) opposes the extensions](#);
- [Dr Margaret Beavis, Medical Association for Prevention of War, counters arguments that the extensions offer a ‘therapeutic milieu’ for veterans \(24 April\)](#);
- [David Stephens in *The Strategist* \(2 May\) refutes Director Nelson’s arguments for the extensions](#);
- [Dr Charlotte Palmer in *Pearls and Irritations* demolishes the ‘therapeutic milieu’ argument \(23 May\)](#);
- [Peter Stanley in *Pearls and Irritations* argues that providing a ‘therapeutic milieu’ is outside the legislated charter of the War Memorial \(19 June\)](#);
- [Brendon Kelson letter to the Prime Minister, summarising arguments against the extensions and supporting the Mitchell alternative \(19 June\)](#).
- [Former War Memorial Director, Brendon Kelson, says it risks becoming a theme park \(24 June\)](#);
- [Former War Memorial senior officer, Richard Llewellyn, points to questionable process regarding the project, along with design flaws \(24 June\)](#);
- [Heritage Guardians media release \(24 June\)](#).

Executive summary

On 1 November 2018, the Australian government announced its support of the Australian War Memorial's proposal for major development work at the Memorial's Campbell site, with the approval of \$498m of forward funding.

The Australian War Memorial has been pushing this ambitious project for some time, on its own website and through announcements and information passed on to mainstream media sources.

While the project to redevelop the Memorial's Campbell site has been placed centre stage, the Memorial has also gone about acquiring the land resources and the funding to undertake extensive further development work at its Mitchell ACT site, where it has considerable (and very good) facilities for storage, conservation and display of its collection.

The Memorial completed in early 2019 a new \$16.1m, 5288 square metres purpose-built facility on the Mitchell site (Mitchell E building), yet this significant expansion of its facilities is downplayed in the Campbell development documentation and on the Memorial's [own website material on 'redevelopment'](#).

The 'Chinese Wall' between the preparation of the cases for the Mitchell and Campbell work has allowed the Memorial to present conflicting arguments to support the same objective – obtaining more space to house large technology objects.

Mitchell offers very significant benefits in terms of cost effectiveness, utility, preservation of the heritage integrity of the Memorial at Campbell, and other practical gains.

But developing Mitchell does not fit with the proposed expansion of the Campbell facility – and its benefits to its proponents in posterity – and thus has been sidelined in the Memorial's view of its desired future.

The Memorial has developed and put before government conflicting documentation, on the one hand to support the Mitchell development and, on the other, to support its grand design for the Campbell site – with the two exercises going ahead almost concurrently. It is impossible that both of these competing propositions can be correct and truthful.

This paper examines the conflict between the Mitchell and Campbell development submissions and concludes that the reasons for dismissing the Mitchell development option are spurious, subjective and in a number of cases, entirely mendacious.

Given the magnitude of government finance (in excess of \$500m, taking account of money already spent on project scoping and the Mitchell E building at \$16.1m) required or already expended to achieve the Memorial's current aspirations, it is inconceivable that a responsible government would readily acquiesce to those aspirations, were it in full possession of the facts.

This paper presents the facts as supplied by the Memorial itself.

It is highly questionable whether the Memorial Council and the government have been provided with reliable forward projection data on storage and exhibition requirements to support the Campbell Precinct proposal.

The publicly available documentation prepared for the Memorial Council and the government provides neither complete – nor in all cases accurate – statements of all pertinent facts upon which to base supporting decisions.

On the question of comparative costs and value for money, the Memorial proposes a \$498m project to deliver at Campbell 11 412 square metres of 'new gallery space'. Simple mathematics suggests that this addresses 'critical space shortages' at a cost of \$43 648 a square metre.

It should also be noted that, in order to *construct* that 'new gallery space', the Memorial proposes the *destruction* of the existing Anzac Hall of 4180 square metres. Thus, it can reasonably be argued that the current Memorial plan for the Campbell redevelopment, for \$498m, adds only 7232 (11 412 minus 4180) square metres overall to the existing gallery space at Campbell.

To provide reliable perspective, here is a comparison: remember that the Memorial has recently completed the new purpose-built storage facility (Mitchell E) for large technology objects at its Mitchell precinct site of 5288 square metres for a projected cost of \$16.1m, a cost of \$3045 a square metre.

In simple terms, comparing the 11 412 square metres at Campbell and the 5288 square metres at Mitchell for Mitchell E, new space at Campbell is to cost (at the estimate most favourable to the Memorial) *around 14 times as much per square metre* as new space at Mitchell. Yet the space in both places will hold much the same exhibits – large technology objects like planes and helicopters.

It is impossible to reconcile the fact that the Memorial would promote the Mitchell Precinct to government 'as an integral component of the Australian War Memorial and home to a significant national collection' while, virtually simultaneously in 2017, arguing when considering development options, that '[t]he dispersed Memorial [to Mitchell] would result in the Memorial at Campbell not being considered as Australia's "national" War Memorial, thereby lessening the importance of the Campbell site and commemorations told within'.

The Memorial could – as is shown by its own submissions to the Public Works Committee in 2017 – very adequately meet all of the potential demands for increased facility at its Mitchell Precinct for around \$100m, or around 20 per cent of the projected cost of the highly contentious Campbell site project.

The Memorial's documentation in support of development at the Campbell site has been constructed so as to ignore or deny the potential of the Mitchell Precinct as offering a viable and cost-effective facility for the Memorial to achieve its mission in future. (The Memorial's figures also seem to be inconsistent across its documentation, and this is a factor affecting analysis.)

Addressing another key point put by the proponents of the extensions, if providing a 'therapeutic milieu' for today's veterans is to be a factor in determining future development options then it must be recognised that there are no surviving World War I veterans and that the population of World War II veterans is rapidly declining. The obvious way of providing a therapeutic milieu for veterans of say, Afghanistan, East Timor, and Iraq is to take floor space from older wars.

This paper's conclusion is that the Mitchell Option is the best outcome for both the Memorial and the nation.

Introduction

1. In October 2017, the Parliamentary Standing Committee on Public Works (PWC) approved the Australian War Memorial's submission for funding for the construction of a 5288 square metres facility, called the Treloar E Large Technology Objects Store, on a site acquired by the Memorial some years previously at Mitchell ACT as a consequence of the Mitchell Precinct Development Plan, which had been approved by the Memorial's Council in 2012.
2. The Memorial's submission was dated June 2017 and [the PWC Report was No. 7 of 2017](#). At an approved cost of \$16.1m, the construction of the Treloar E (Mitchell) facility made good sense and good use of the Memorial's previous acquisition of land for the purpose.
3. The arguments the Memorial advanced to the Public Works Committee for the Treloar (Mitchell) project hold up well to scrutiny. This contrasts strongly with the arguments propounded for the proposed Campbell site redevelopment project, unless the other Memorial developments – both previous and in the pipeline – are ignored or denied. This is incontrovertibly proven by the Memorial's own documentation.
4. As well, it is important to recognise the findings of the Australian National Audit Office (ANAO) published 13 June 2018 regarding the Memorial's collection development activities. That report references previous ANAO adverse determinations on the Memorial's collection management activities, dating back to before the turn of the millennium. This is not inconsequential, since ensuring the growth of the Memorial's collection is a foundation argument for both the Mitchell Precinct and the Campbell Precinct propositions.
5. Of further important note is the Memorial's Options Assessment Report (Rev A), dated 18 August 2017, a mere two months after submission of the Memorial's Treloar E (Mitchell) Project submission to the PWC. The Options Assessment Report is published on the Memorial's website; it summarily dismisses the 'Mitchell Option' for exhibition purposes on subjective – and when compared with other Memorial statements – evidently spurious grounds. (See [my earlier paper](#).)
6. When the Options Assessment Report, the Treloar E (Mitchell) Project submission to the Public Works Committee, the ANAO Report of 2018 and the Memorial's PWC Submission of 1992 (that resulted in the construction of the existing Treloar Resource Centre) are examined as a body of work, there emerge glaring inconsistencies, contradictions, and at the very least some highly questionable conclusions and what some might take as deliberate obfuscation of pertinent facts. The following paragraphs provide links to these key documents.

Source documentation

7. The analysis in this paper has been drawn entirely from publicly-available official sources. The conclusions can be argued, but if the underlying data and documentation is deemed invalid then using it for any purpose must be questioned – and this brings up cascading issues of veracity.
8. The source documentation cited throughout this paper is:

[Parliamentary Standing Committee on Public Works: Report relating to the Storage/Display Facility for Australian War Memorial, Mitchell, ACT: 17th Report 1992](#), hereafter cited as **Treloar Centre (Mitchell) PWC Report 1992**;

[Australian War Memorial: Treloar E Large Technology Objects Store Project – Statement of Evidence to the Parliamentary Committee on Public Works, June 2017](#), cited as **Treloar E Project (Mitchell) Statement 2017**;

[GHD \(Consultants\): Report for Australian War Memorial: Australian War Memorial Redevelopment Options Assessment Report, 18/08/2017](#) (**Options Assessment Report**);

[Australian National Audit Office Report No. 46 of 2017-18: Management of the National Collections, June 2018](#) (**ANAO Report 46**);

[Council of the Australian War Memorial, 161st Meeting, Tuesday, 3 July 2018: Australian War Memorial Redevelopment Project – Design Options](#) (**Design Options**).

9. With the exception of the **Treloar Centre (Mitchell) PWC Report 1992**, all of these documents were prepared within a short time period (approximately, between June 2017 and July 2018) and the preparation activity must have overlapped to a significant degree. The same authors appear in more than one of these documents. We have bolded the references to these documents in the following paragraphs, to emphasise that the arguments in the paper rely on these publicly available documents, three of them prepared by the Memorial or its consultants, and two of them commenting on the Memorial's plans.
10. It would beggar belief to suggest that the inconsistencies (or even downright contradictions) between these documents could be due to the authors being unaware of the previous or concurrent work. Equally, it is impossible that the exhibition purpose which was part of the Treloar Centre's original design brief – **Treloar Centre (Mitchell) PWC Report 1992** – could be mistaken or overlooked, as the fabric of the Treloar Centre (visitor foyer, visitor galleries down the sides of the Treloar Centre, facilities for use by the disabled) makes such use glaringly obvious.

The genesis of the Treloar Centre

11. The existence of the Treloar Centre (originally, the Mitchell C building) was the result of the confluence of three situations around 1990:
 - the Denton, Corker and Marshall (DCM) Campbell development master-plan;
 - the imminent development of facilities at Duntroon ACT for the Royal Military College Logistics Complex; and
 - the exhaustion of storage space at the Mitchell ACT conservation and storage site buildings (Mitchell Annex and Mitchell B building).
12. It should be noted that a significant number of large technology objects were at that time effectively outhoused undergoing restoration: the Me262 at CAC Melbourne, the Mosquito at de Havilland at Bankstown, the Zero at RAAF Wagga, the Me109 in storage at St. Marys in Sydney, two Sea Fury aircraft at Sydney and Nowra, the Gayundah Gun at Bendigo, and others.
13. The Duntroon connection is due to the fact that for many years the Memorial had been granted occupancy of an old shed in the Duntroon grounds, in which was housed a wide range of mostly large technology objects including a T34 tank, a Canberra Bomber, landing craft, vehicles, heavy ordnance and other items (including an elephant skull of strange provenance – unless Australia had troops serving with or against Hannibal – which is undocumented).
14. The DCM master plan was a result of Memorial management acting to address the fact that the existing exhibition space at the Campbell site was seriously inadequate for display of larger technology and to provide adequate access to and storage of the Research Centre collection. The current Memorial configuration is in large part the product of the DCM master plan.
15. However, the government of the time was not prepared to provide funding for the overall DCM master plan and Memorial management had to make hard decisions. Construction of the Administrative building freed up space in the Memorial building for access to research collections and expanded lower-floor galleries for the exhibition of both military technology and art deemed of high importance for interpretation of the Australian experience of war.
16. Memorial management was also simultaneously faced with the dual problem of having to find alternative accommodation for the technology stored at Duntroon and utilising what funding might be forthcoming to allow for storage, restoration work and public access to the Memorial collection of important large technology items.
17. In these circumstances, it would have been irresponsible of Memorial management to commence work on Anzac Hall that might not be completed in the foreseeable future, as that would not have guaranteed solution of the Memorial's dilemma and would indeed have exacerbated the problems it already faced.

18. A happy compromise was found, however: development of a facility contiguous to the existing Mitchell B building, adjacent to the Mitchell Annex conservation facility on land available for such development, within a budget achievable under the then current government constraints.
19. Hence, the rapid development of a proposal for New Policy Proposal funding via PWC approval, of construction of a facility that combined the functions of storage, support for conservation work on large technology objects, and public access to view the objects.
20. A chapter-and-verse examination of the Treloar Centre facility features is not necessary here. Suffice it to say that what was originally known as ‘Mitchell C’ (later to be dubbed ‘The Treloar Centre’), was approved, built within budget and time and subsequently operated as intended, as a storage, conservation *and public access* facility.
21. That a facility at Mitchell is integral to the delivery of the Memorial’s functions has not been questioned – until 2018. A check of [the Memorial’s Annual Reports since 2014](#) shows the Memorial has been happy to boost its overall visitor numbers by recording visitors to Mitchell in *combination with* visitors to Campbell. This demonstrates that the Mitchell Precinct has been seen as complementary to the Campbell Precinct, not antithetical to it as suggested in the **Options Assessment Report**, section 4.2.
22. Visitor access to the Memorial’s collection at Mitchell is implicitly repudiated in the **Options Assessment Report** as worthy of consideration. The Mitchell Option is dismissed. Among the arguments against the Mitchell Option is the statement that ‘this Option is inconsistent with the options outlined within the Mitchell storage facility IBC and Detailed Business Case (DBC), contradicting past government approvals’: **Options Assessment Report**, section 4.2.
23. However, use of facilities at Mitchell for display of Memorial collection items is *unequivocally* a part of the PWC 1992 approval for the development of the Treloar Centre: ‘The Committee recommends the construction of a storage-display facility for the Australian War Memorial at Mitchell, at a cost of \$6.5m’: **Treloar Centre (Mitchell) PWC Report 1992**, para 73.
24. The **Options Assessment Report** statement that ‘[the Mitchell Option] is inconsistent ...’ does not prove that the Mitchell Option contradicts ‘past government approvals’. It proves rather that the Memorial’s **Treloar E (Mitchell) Project Statement** submitted to the PWC in 2017 was either negligent or duplicitous in not recognising that the existing Treloar Centre is and has been an integral part of Memorial exhibition activities since 1994.
25. The cascading result of that action is that the Mitchell Option has been discarded in the preparation of the **Design Options** document.
26. It is inconceivable that a prudent funding authority would approve sequential funding (Mitchell, Campbell) on the basis of entirely contrary submissions.

The Memorial's case for space

27. It is difficult for the Memorial to make reliable estimates of future requirements for storage or exhibition. This is because the Memorial's collection is so very disparate.
28. Numbering of items as a basis for estimating collection storage requirements is not useful. 'An item' is (or should be, in proper museum practice) one entity identified by an Accession record. However, 'an item' may be a sheet of a few stamps (e.g. AWM2018.20.54) or a Centurion Tank (REL36387).
29. It would seem that the Memorial has difficulty reliably reporting the number of items in its collection:

From the Memorial's **Treloar E (Mitchell) Project Statement 2017**:

1.1.3: Australian War Memorial Collections

Today, **over three million items** [author's emphasis] record the details of Australia's involvement in conflicts and operations, from colonial times to the present day.

30. The ANAO begs to differ, *while using the Memorial's own statistic*. Table 1.1 of **ANAO Report 46** quotes 'Entity Annual Reports, 2016-17' as the source for 'number of items' as 735 505. Not 'over three million'.
31. It is unlikely that the Memorial either acquired or disposed of some 2.26 million collection items between estimating the volume of the collection for the purposes of its submission to the Public Works Committee for the extension of storage at Mitchell and doing the same thing in its Annual Report for the same basic time period.
32. It is also worth noting that, 20 years ago, the ANAO, in its [Audit Report No. 8, 1998-1999](#) (as paraphrased in Table 1.3 of [ANAO Report 46 in 2017-18](#)) 'recommended that the Memorial improve monitoring processes relating to acquisitions and deal with its backlog of registrations'. It appears that little has been done in response, as **ANAO Report 46** (para 2.52) notes that, 'The Memorial's most recent Collection Development Plan, however, covering the period 2010-2013, is out of date and requires review'.
33. One might well question both the wisdom and the reliability of quoting collection numbers when different sources from almost identical periods show such a vast disparity and when the ANAO's work throws doubt on the accuracy of the Memorial's counting.
34. Rather than trying to count items, it is more accurate and useful to measure the actual space (both storage and exhibition) that houses collection items. Documents and other fundamentally two-dimensional objects such as photos, film and sound recordings and files etc., in both the Photo, Film and Sound Collection and the Research Centre collection are realistically outside the ambit

of ‘collection items’ for the purposes of looking at Mitchell Precinct storage and potential visitor utility development.

35. Compiling figures of the actual collection space in use by the Memorial requires some digging but these space figures are likely a more reliable basis for estimation of future requirements.
36. Reliability and veracity must be paramount here, given the importance of the Mitchell Precinct Development Plan:

The Australian War Memorial commissioned the development of the Mitchell Precinct Development Plan, which involved the mapping of the historical patterns of collections growth against the available storage capacity. The plan was based on two decades of research and monitoring, and established the design principles for future storage at Mitchell. By extrapolating the historical data and considering known and likely collections that will become available in the coming years, the Mitchell Precinct Development Plan estimates an increase of 4,000 square metres of storage per decade will be required to house the collections. Its analysis of collection growth, forecast the Memorial’s storage and access needs for the next century: **Treloar E (Mitchell) Project Statement 2017**, para. 1.5.

37. It needs to be remembered when utilising figures from the **Treloar E (Mitchell) Project Statement 2017** (para 1.9) that ‘Storage Space’ incorporates a de facto 35 per cent area for ‘circulation’ beyond that actually taken up by the objects.

Treloar Collections Storage – Current Storage Capacity

The total storage space available for collections at the Treloar Resource Centre is 15,500 sqm. Generally, the collection’s capacity is approximately 65% of the total floor space, allowing for space around each collection and circulation areas. At the Treloar Resource Centre there are also functions supporting collection conservation in the workshops. The current total space available at each of the storage facilities and the year the land was purchased are:

- a. 1978 – Treloar A – 4,500 sqm;
- b. 1986 – Treloar B – 3,500 sqm;
- c. 1993 – Treloar C – 5,500 sqm; and
- d. 2011 – Treloar D – 2,000 sqm.

38. So, using the 65 per cent figure for actual storage footprint, the current Mitchell floor space actually occupied by collection items comes to $15\,500 \times 65 \text{ per cent} = 10\,100$ square metres (rounded). To this we need to add the reported desideratum at **Treloar E (Mitchell) Project Statement 2017**, para 1.12.1, of $1807 \text{ square metres} \times 65 \text{ per cent} = 1175$ square metres. So, we then arrive at a total of $10\,100 + 1175$ or about 11 275 square metres.

39. Then, we need to add the space taken up by exhibitions in the Campbell site, for which a circulation space ration of 25 per cent appears to be the standard accepted in the **Design Options** paper. This comes to an artefacts on display footprint of (as near as can be deduced) 12 320 square metres for the Main Building plus Anzac Hall (compare **Design Options** para 5.4, table 1B).
40. So the total of Treloar and Campbell is 11 275 + 12 320, or about 24 000 square metres, when rounded up. That figure does not include artefacts displayed outside the buildings but, despite the fact that the figure may not correspond exactly to the somewhat forensic quality of the figures extracted from various reports, it is probably reasonably useful for the purposes of analysis.
41. But, what does the space calculation really mean?
42. It is as good a basis for analysing the Memorial's future storage space needs as it may be possible to get, given the vagaries of projecting even the nature of relics collections for the next twenty, let alone one hundred, years as the Memorial has ventured to do.
43. The context of development of the Memorial's collection must be taken into account when attempting to justify any claim for future storage or exhibition space.
44. Development of the Memorial's collection began a very long time before there was a Memorial or even before there was a definite proposed existence of a Memorial. CEW Bean managed to 'acquire' a compound – he may well have made an excellent Quartermaster due to his force of personality exhibited by that action alone – to which he exhorted the sending of 'relics'. (Legend has it that he was so successful that at one time a platoon of captured German soldiers was sent with a note attached saying something on the lines of 'for the War Memorial'.)
45. Undeniably, a very large and wildly disparate collection of 'things' commenced, including, but in no way limited to, the Amiens Gun, the Shellal Mosaic, the Mephisto Tank, personal effects of dead and never-to-be-found soldiers, Gallipoli landing craft, depleted (and some undepleted) Mustard gas containers, huge naval shells and projectiles, diaries. A list of relics of vast proportions. And ration packs, some with biscuits and cheese that survived mostly intact to near the end of the century, remaining as inedible as on the day they were packed.
46. All these were sent to Australia and housed wherever space could be found. By the outbreak of World War II, there was about to be a Memorial, and the activity of collecting battlefield and associated relics had a focus and purpose that had not formally existed during World War I. That informality had in no way hindered the development of 'the Collection'.
47. Therefore, any assessment of future collection storage requirements needs to at least recognise that the existing space requirement has been created by at least ninety years of collecting, through two World Wars, Korea, Vietnam, Iraq, Afghanistan. It also needs to be recognised that a significant amount of that collecting was undertaken without curatorial direction of any kind.

48. We can use figures from the **Treloar E (Mitchell) Project Statement 2017** (para 1.12.1), that 90 years of collecting has created a total storage footprint of around 24 000 square metres. That equates to a collection growth of 267 square metres a year on average, for the relics themselves. When the further space for ‘circulation’ (that is, visitor movement) of 35 per cent that the Memorial factors in to its space requirement calculations is added, the annual estimated requirement is for 359 square metres a year increase in collection ‘storage’ – which is reasonably close to the **Treloar E (Mitchell) Project Statement 2017** (para 1.12.3) proposal of 4000 square metres over a decade, or 400 square metres a year.
49. Is extrapolation from history a reliable indicator for the future?
50. The short answer to this question has to be, ‘No’. And in the longer version, it has to be ‘No, but it’s the best guess we can make’.
51. Self-evidently, this does not support any arguments either for or against the development of new area(s) for the Memorial, be they for ‘storage’ or ‘exhibition’. There are at least four sound reasons for coming to this conclusion:
- The nature of, and the ‘artefacts’ associated with, military operations will very likely change substantially in a relatively short time-span.
 - The points of emphasis when interpreting military operational experience and the effects on the national psyche are also likely to change significantly.
 - The public requirement for remembrance, interpretation, research, and just general access for enthusiasts to examples of military equipment is almost certain to change significantly as Australian society evolves.
 - The methodology and media for delivery of remembrance and interpretation is already changing markedly (e.g. see the Monash Centre at Villers-Bretonneux) and it is inevitable that this will further evolve.
52. Engaging in deeper discussion of the above points is not going to resolve anything either way. The overarching conclusion has to be that the Memorial must be flexible in all aspects of its activities: remembrance, interpretation, research and the management of collections.
53. To suggest that space requirements can be reliably extrapolated from the Memorial’s existing situation out to a period of more than 75 years into the future, is plainly nonsense; to suggest that it could be reliable ‘for the next century’, as in **Treloar E (Mitchell) Project Statement 2017**, para 1.5, is an assertion that any knowledgeable audience would consider absolutely incredible.
54. It is highly questionable whether the Memorial Council and the government have been provided with reliable forward projection data on storage and exhibition requirements to support the Campbell Precinct proposal.

The potential for flexibility: Campbell vs Mitchell sites

55. In the evolution of the Memorial's recent planning for development of both the Mitchell site according to the Mitchell Precinct Development Plan – refer **Treloar E (Mitchell) Project Statement 2017**, para 1.6, and the Campbell site as described in the **Design Options** paper, flexibility to reflect changing circumstances does not feature.
56. It is evident, however, that, of the two streams of development, only one provides any real flexibility and that is the Mitchell Option in the **Options Assessment Report**, section 4.2: 'Utilise the Memorial's Mitchell Facility'.
57. This option for addressing what is expressed as a 'critical element' to allow the Memorial to be 'capable to continue to allow all three functions [Commemorative Area, Memorial Galleries and Research Centre – author] to continue within the same precinct', is *dismissed* in the **Options Assessment Report**, section 4.2. (Another option, 'Refurbishment of the Mitchell Site' is dismissed with almost identical arguments in **Options Assessment Report**, section 6.3.)
58. While that dismissal is essential to support the proposals for major development of the Campbell site, it is plainly contradicted by:
- the Memorial's 2017 submission to the Public Works Committee for development of capital infrastructure at Mitchell;
 - previous approval of funding for capital works at Mitchell: **Treloar Centre (Mitchell) PWC Report 1992**;
 - examination of the economics of the different possibilities;
 - the Memorial's long-standing practice of reporting visitation to Mitchell in combination with visitation to Campbell (see above para 21); and
 - common sense.
59. The consultants rate the Mitchell Option as being 'very high risk to the Commonwealth and the Memorial' (**Options Assessment Report**, section 4.2). In [my earlier paper](#) (especially paras 101-42) I argued in detail as to why this conclusion was 'highly suspect'.
60. Setting the 2017 arguments for Mitchell alongside the consultant's 2017 arguments for Campbell supports my argument. The Memorial's documentation for the Mitchell work and the Campbell project is glaringly inconsistent. *At virtually the same time in 2017*, Mitchell was being boosted before the Public Works Committee, but being damned by the Memorial's consultants. Neither the Memorial Council nor government appear to have recognised the conflicts that exist in this documentation. Yet, as I said in [the earlier paper](#) (especially paras 114-15), both the Mitchell and the Campbell cases sought the same objective – more space to house large technology objects.

The 'Campbell Redevelopment' plan: the objectives, claims and figures do not mesh

61. The **Design Options** paper provides four Options for consideration, but is strongly slanted to acceptance of only Option 1: the demolition of the existing Anzac Hall, replacement with a two-level structure and a slew of associated works to expand the current relatively simple structures and relationship of the existing buildings into a highly complex mix of below and above-ground functional areas.
62. The **Design Options** paper indicates that the favoured Option 1 exhausts the potential for further expansion of the Campbell site within its current boundaries, unless major disruption to the heritage fabric of the entire site is undertaken.
63. As a result of promoting Option 1, the Memorial has already made – but may not be pursuing – a claim for expansion beyond its current site boundary, for space to be re-allocated from public land now designated as a wildlife and recreational preserve (the Mount Ainslie Remembrance Park portion of the Mount Ainslie Nature Park) for the purposes of additional parking space.
64. In the **Options Assessment Report** (section 3.1), the Memorial's situation is described:

The War Memorial is 75 years old and has undergone a number of fit out and refurbishment projects over its recent history. These projects have seen the last of the available space, originally designed for storage, staff accommodation and other back of house (BOH) functions, converted into exhibition areas. Piecemeal additions to the Memorial's galleries to accommodate new subjects are no longer feasible or available.
65. The **Options Assessment Report**, having dismissed a range of options, embraces the Campbell Precinct rebuilding and redevelopment option (later Option 1):

This option requires the development of a Masterplan that identifies all future options for maximisation and saturation of the precinct, up to and including the acquisition of adjacent land. The works would be planned for delivery over the next 20 years; allowing greater certainty for the Memorial and its stakeholders, and allow for the development of the Memorial to continue to reduce the risk of future works incurring a premium associated with failure to appropriately plan (**Options Assessment Report**, section 7.2).
66. The works would address the Memorial's permanent needs through the creation of additional exhibition space and the relocation of some back-of-house functions out of the main building.
67. Option 1 is quoted as meeting the Design Principles (**Design Options**, section 4), including, from Design Principle 1 (para 4.2):

Expanding the museum through new additions and gallery refurbishments will ensure that the Memorial can continue to achieve world class museum practices whilst interpreting the

Australian experience in war and operations of those who have served, are currently serving and will serve in the future. The reorganisation of the precinct includes a number of new additions incorporated within the fabric of the main building. Supplementary purpose-built spaces will enable the precinct to reach its full potential, enhancing galleries and public areas. This will result in the Memorial responding to the needs of those who use it, whilst maintaining key areas and traditional functions.

68. In the **Design Options** paper (para 5.3), the Campbell Precinct Master Plan is addressed, as Option 1.

The allowance included in the planning for additional gallery space is: (i) 2,000 square metres for circulation for the Main Building in its current form and layout, (ii) **8,000 square metres of new gallery space** [author emphasis] and (iii) 2,000 square metres for circulation for the new gallery space. Therefore, an additional 12,000 square metres of space is used to test the **Design Options**, noting this may vary as the gallery master plan work progresses.

69. It might reasonably be expected from Design Principle 1 – cited above – that for the level of expenditure proposed and in view of the fact that a delivery program extending for possibly twenty years is envisaged, the Campbell Precinct Master Plan would provide for foreseeable future needs. However, it appears that this is not the case (**Design Options**, para 5.3):

Preliminary analysis of underrepresented conflicts and peace-keeping activities has resulted in a calculation that the additional gallery space required to tell the stories is in the order of 8,000 square metres.

70. Perhaps the authors of the **Design Options** paper have prescience not afforded to the rest of us, but if the area needed for ‘underrepresented conflicts and peace-keeping activities’ has been *calculated* then that refers to past and current operations, i.e. there can be no ‘future’ area included.
71. Alternatively, the future area requirement has been *estimated*, in which case the basis for ‘calculation’ is speculative.
72. Since it is impossible that the presentation of figures for future space requirements can be anything but a hopeful estimate, basing funding requirements on slippery ground *does not provide the Memorial Council and government with the reliability both should require to support funding allocation*.

Does the 'Campbell Redevelopment' option provide flexibility?

73. Obviously, if normal Museum practice of developing new exhibitions to meet new circumstances and retiring older exhibitions (described pejoratively in the **Options Assessment Report**, section 3.1 as cannibalizing current displays) is continued, then there is flexibility. Since (demonstrated by the analysis of future space requirements and availability at the Campbell site) the extra exhibition space to be delivered by the massive construction project only meets current area requirements, it is obvious that, even with this development, such rotation of exhibitions would be needed.
74. However – and to illustrate that a great deal of analytical latitude would be necessary if the Memorial's contentions were to be taken seriously – the passage of time shifts the goalposts.
75. The Memorial has appropriated (with neither justification nor legislative approval) a role of providing space for the solace and rehabilitation of Veterans. This is possibly a laudable aim, though it must be recognised that it is medically and practically spurious, as has been pointed out by medical practitioners [Margaret Beavis](#) and [Charlotte Palmer](#). ([Professor Peter Stanley](#) has pointed to the lack of justification in the Memorial's Act for it taking on such a role.)
76. If the so-called 'therapeutic milieu' is to be seriously included as a factor in determining future development options then it must also be recognised that there are no surviving World War I veterans and that the population of World War II veterans is rapidly declining. When applied to arguments for maintaining the current exhibition space at Campbell for World War I and World War II exhibitions, the therapeutic milieu argument is self-refuting. The obvious way of providing a therapeutic milieu for veterans of say, Afghanistan, East Timor, and Iraq is to 'cannibalize' floor space from older wars.
77. Australian service in World War I – generically, 'the Anzac tradition', and the very different circumstances of defence of the country from genuine attack in World War II, are obviously core elements of the Memorial's commemoration and interpretation activities. However, the outcomes of both wars is well documented and it is not unreasonable to examine the degree to which in 2019 and beyond exhibition space needs to be allocated to them at the Campbell site.
78. There will always be competing demands for exhibition space at Campbell, to tie in interpretation, commemoration and research functions. The **Options Assessment Report** proposition that reducing space previously allocated to military actions is 'cannibalizing' them is a pejorative and self-serving justification for the expansion plans of the Campbell Development option.

79. The degree to which the Campbell Development option provides flexibility is a function of management decision-making, not empirical fact. Management decides the allocation of existing space; it need not ask for more space to accommodate new wars – let alone to accommodate bright ideas.
80. There is no evidence in any of the Memorial's current documentation that any consideration has been given to justifying currently expressed exhibition requirements. Propositions feature implicitly in the **Options Assessment Report**, when they need to be stated and critically examined. The Memorial's paperwork is underpinned by the notion that a reduction in exhibition space at Campbell for old military actions (especially the two World Wars) is not acceptable.
81. The arguments in the **Options Assessment Report** offer the Memorial Council and the government justification for supporting the allocation of funding, but the Memorial stakes its claim on unproven grounds.
82. The Memorial indicated in the **Options Assessment Report** (section 3.1):

As the Memorial cannot address critical space shortages, the Do Nothing option would not allow the Memorial to continue to operate as a shrine, world-class museum, and an extensive achieve [sic].

83. In response, the Memorial proposes a \$498m project to deliver at Campbell 11 412 square metres of 'new gallery space' (**Design Options**, para 5.4, table 1A). Simple mathematics suggests that this addresses 'critical space shortages' at a cost of \$43 638 a square metre. (It should be noted here that to actually achieve the 'new' gallery space, the Memorial proposes to demolish the existing 4180 square metres of Anzac Hall – therefore actual *additional* gallery space may only be 7232 square metres – 11 412 minus 4180 – at the stratospheric cost of \$68 861 a square metre. The Option 1 documentation does not provide clarity on this point.)
84. To provide reliable perspective, here is a comparison: the Memorial has recently completed the new purpose-built storage facility for large technology objects at its Mitchell precinct site – see **Treloar E (Mitchell) Project Statement 2017** – of 5288 square metres for a projected cost of \$16.1m: a cost of \$3045 a square metre, when rounded.

Does the Campbell site option deliver core needs for the Memorial?

85. Given that the 'hook' argument for the Campbell Precinct Development Plan is the 'critical space shortage', the Australian public would be justified in expecting a *spectacular* improvement in a facility at Campbell costing *at least* 14 times as much per square metre to deliver new gallery space, when compared with a fairly industrial (but very functional for the purpose) building at Mitchell. It is difficult to envisage how vastly more expensive infrastructure could contribute to telling 'the story' of the harsh, dirty and dangerous business of military operations.

86. One thing that Option 1 does *not* deliver is increased high-quality display space for large technology objects (LTOs). As a result of the proposed demolition of the existing Anzac Hall of a reported 4180 square metres (**Design Options** paper, para 5.4, table 1B) of LTO-capable display space, is replaced with an underground floor (presumably capable of LTO display) of 3282 square metres (**Design Options**, Level 0 Area Key Plan).
87. While that loss of around 900 square metres of LTO-capable display space may be remediated by use of space in the Atrium of 2005 square metres (**Design Options**, Level 1 Area Key Plan), it should be noted that this feature is by no means an assured part of Option 1, as the following paragraphs show.

Key Risks of Option 1

- Option 1 has a risk that the atrium will not be approved by the planning authorities. This would potentially require that the link gallery from the Concept Master Plan be reinstated, with additional cost and reduced gallery space (**Design Options**, para 8.4).
88. It would be a very poor bargain indeed, should the Memorial spend at a rate per square metre *more than 14 times* the amount actually needed to provide quality LTO exhibition space, to get less area in return.
89. Memorial visitors might feel cheated out of the better experience which is currently available to them in the existing Anzac Hall.
90. It is not possible to say with certainty that the Option 1 proposal fails to provide flexibility in future exhibition presentation, but it is inconceivable that more limited space for the exhibition of LTOs at Campbell in future could do otherwise than constrain flexibility.
91. The **Design Options** paper notes the necessity for flexibility in exhibition development:

Design Principle 4 – Enhanced Circulation and Increasing Visitation

- Integral to the success of any Memorial redevelopment is a flexible gallery master plan (GMP) that anticipates continued growth as part of a fifty year plan. A GMP is being developed in tandem to the precinct master plan (PMP). The architectural team has worked with the GMP to ensure that each discipline's central principles align in all of the **Design Options**. Although not responding to a finished GMP, the four **Design Options** are sensitive to creating an environment that can accommodate myriad flexible design methodologies for galleries well into the future (**Design Options**, para 4.5).
92. There is an apparent significant discrepancy (not to mention a serious admission of temporal anomaly) in stating that '[t]he architectural team has worked with the GMP ...', when the immediately preceding sentence states that '[a] GMP is being developed in tandem to the precinct

master plan’ – given that Option 1 is (apparently) the Concept Masterplan (**Design Options**, para 2.2). Although Design Principle 4 stresses that a ‘flexible gallery master plan’ is ‘[i]ntegral to the success of any Memorial redevelopment’, para 4.5 states that the four **Design Options** discussed are ‘not responding to a finished GMP’. So, the stated importance of any proposal being underpinned by a GMP is explicitly bypassed in the development of the **Design Options**.

93. This seems to be a case of having to ‘open the box with the crowbar you will find inside’. A prudent government would require a more thorough delivery of the key planning elements for ‘success of any Memorial redevelopment’ before approving expenditure of \$498m.
94. As for ‘creating an environment that can accommodate myriad flexible design methodologies for galleries well into the future’, the reduction of quality space for the display of LTOs in Option 1 from that currently available in Anzac Hall is obviously antipathetic to that objective.

The ‘Mitchell Option’

95. The summary and assessment of the reasons why the ‘Mitchell Option’ was dismissed in the **Options Assessment Report** from further consideration at a very early stage of development of the Campbell Precinct Development Plan appear in [my earlier paper](#) and do not need repetition.
96. The assessment provided in the **Options Assessment Report** reduces to a batch of arguments as to why the Mitchell Option does not suit the purposes of the proponents of the Campbell Option. What the assessment does *not* present is an examination of whether the potential for development of storage and visitor facilities at Mitchell meets *the Memorial’s needs* rather than meeting the objective of supporting what many commentators have argued is primarily a vanity project, beloved by those promoting it and whose names will appear on foundation stones.
97. In terms of meeting the Memorial’s needs, the answers are contained in the **Treloar E (Mitchell) Project Statement 2017**. It must be remembered that this submission to the Public Works Committee for funding to proceed with the Treloar E building was prepared in the same general time period that the Campbell Precinct Development Plan started to gather a head of steam: the **Treloar E (Mitchell) Project Statement** is dated June 2017, while the **Options Assessment Report** is dated 18 August 2017.
98. The Treloar E building plans were prepared by the same consultants who undertook the **Options Assessment Report** assessment and who have been the lead consultants for the **Design Options** development (GHD/GHD Woodhead). It is possible that a Chinese Wall strategy maintained compete disjunction between the two bodies of work – though to accept that possibility requires a vast leap of faith.
99. However, if considered in isolation from the material developed subsequently to support the overblown Campbell Precinct project, the **Treloar E (Mitchell) Project Statement** offers a

persuasive case for inclusion as an integral, indeed, ‘an essential asset of the Australian War Memorial’: **Treloar E (Mitchell) Project Statement 2017**, para 1.4. The only element notable by its omission in the Treloar statement is references to both development and use since 1994 of the visitor facilities already existing at the Mitchell Precinct.

100. That omission conveniently excises the inescapable fact of such facilities at the Treloar Centre site. It is a clear denial of the approval by the Public Works Committee in 1992 of its construction as a ‘storage-display facility’: **Treloar Centre (Mitchell) PWC Report 1992**, para 73.
101. In fact, the **Options Assessment Report** states that the Mitchell Option contradicts ‘past government approvals’ (**Options Assessment Report**, section 4.2) contained in the Memorial’s Initial Business Case and Detailed Business Case for the Treloar E project, and which are therefore themselves false statements. The **Treloar E (Mitchell) Project Statement 2017**, para 1.4, does include a passing reference to visitor use of the Treloar Research Centre.
102. The publicly available documentation prepared for the Memorial Council and the government provides neither complete – nor in all cases accurate – statements of all pertinent facts upon which to base supporting decisions.

The potential of the Mitchell Precinct for increased visitor access to the National Collection

103. A land acquisition programme (the Mitchell Precinct Development Plan or MPDP) approved by the Memorial Council in 2012 has enabled the Memorial to acquire four land lots contiguous to the Treloar Research Centre (Mitchell C building), thus comprising with the Mitchell B and Treloar Research Centre site in total 33 690 square metres (3.37 hectares).
104. Examination of the Mitchell Precinct Development Plan Principles – as contained in the **Treloar E (Mitchell) Project Statement 2017** – explicitly shows the potential of the Mitchell site to provide visitor experience of a large part of the National Collection. In the following paragraphs, the excerpts from the MPDP are in italics.

Principle 1 – Whole of Institution Consideration

105. *The Treloar Resource Centre integrates with the functions at the main Memorial building. Any redevelopment affecting conservation and other exhibition support activities will have an impact on broader Memorial operations.*

Comment: The fact that Memorial operation at Mitchell is ‘part of the whole institution’ has been unquestioned since the 1978 acquisition of land for the development of the Conservation Annex (Mitchell A building) up until the existence of Mitchell operations as apparently a ‘competitor’ to the Campbell Precinct Development Plan:

The dispersed Memorial would result in the Memorial at Campbell not being considered as

Australia's "national" War Memorial, thereby lessening the importance of the Campbell site and commemorations told within (Options Assessment Report, section 4.2)

This staggering reversal of sentiment in the **Options Assessment Report** is also repudiated by Design Principle 9 – below.

Principle 2 – Maximise Site Usage

106. *The existing Treloar Resource Centre has sufficient land to accommodate another 75 years of storage growth through progressive development of higher density two level buildings.*

Comment: '75 years of storage growth' is, by the Memorial's method of calculation, 30 000 square metres of space, comprising 19 500 square metres of actual storage footprint and 10 500 square metres of 'circulation' space. The lack of heritage restrictions at the Mitchell Precinct allows design to be derived from function, which inherently allows for more flexibility than is available at Campbell. It is obvious that a capability of developing 30 000 square metres of purpose-driven area is a vast improvement on the 11 412 square metres of new gallery proposed in the Memorial's Design Option 1 proposal and at a cost which, on present evidence, is at least 14 times cheaper per square metre.

Principle 3 – Design Flexible Building Storage Form

107. *The Treloar Resource Centre must have spatial and structural flexibility to accommodate the diverse storage requirements including size and load impact, handling and movement, environmental control and security. It must be capable of responding to changes in collection type and acquisition rates over time.*

Comment: This is an entirely basic and fundamentally *critically important* element of planning a museum facility into the relatively distant future. It is also not something capable of being properly achieved at the Campbell site because of the myriad considerations for the Campbell site to continue to deliver its tripartite roles (memorial, museum, research centre) within the heritage considerations.

Principle 4 – Design Flexible Building Storage Form [sic]

108. *There is flexibility in sizing the area of each stage of development to meet funding and operational demands. The buildings should have an optimal module of 50 metres width, which relates to structural, services, crane and efficiencies of use.*

Comment: The author does not know why Principle 3 and Principle 4 have identical titles; this appears to be a mistake. This Principle appears to be an amplification on Principle 3, but is agreed as important, and equally can be related to the **Design Options** to demonstrate the constrictions upon utility of Design Option 1.

Principle 5 – Organise around shared infrastructure and support facilities

109. *Staged developments should be configured around a central spine to benefit from operational efficiencies of shared vehicular movement and handling yard, loading areas, plant and equipment, security staff and amenities.*

Comment: This is fundamental to the efficiency of delivery of an optimal solution to the Memorial's future storage and display needs. What is missing in the expression is that the existence of properly developed visitor facilities at the Treloar Centre (a visitor entrance from Vicars Street, a visitor foyer, handicapped visitor facilities, including a stretcher-capable evacuation lift from the visitor foyer and gallery area, car and bus parking within the Mitchell B and Treloar Centre site) provides the core of visitor infrastructure.

Principle 6 – Standardise Ground Floor and Future Connections

110. *Future buildings should share common ground level for easy connections between stages. The different ground levels to existing Treloar B and Treloar C have highlighted operational inefficiencies when moving collection items and accessing support facilities between the two.*

Comment: An important point. At the time of development of the Treloar Research Centre, funding was restricted so this objective was not attainable. It is obvious that the proposed bi-level and submerged redevelopment of Anzac Hall in the Campbell Precinct proposal is absolutely and completely contrary to this objective – yet those problems go totally unremarked in the **Design Options** paper. A (relatively) common ground level throughout the Mitchell Precinct would also support visitor circulation, particularly in regard to disabled access to all areas.

Principle 7 – Environmentally Sustainable and Responsible Design

111. *Develop holistic design solutions that consider sound planning, economy of materials, efficient use of resources and reduced maintenance and running cost. Consider building lifecycle planning where structure can last over 100 years whilst building fabric and services have shorter lifecycle of 25 years.*

Comment: Again, a highly desirable objective, attainable within the co-ordinated MPDP and not attainable at the Campbell site, for obvious reasons (heritage considerations and existing building and site fabric, for a start).

Principle 8 – Develop Precinct Wide Services Strategy

112. *Consider a modular and extendable central plant and precinct wide services strategy that will offer energy efficiency, shared redundancy, ease of maintenance and replacement access.*

Comment: As for para 105 above.

Principle 9 – Strengthen Public Presence

113. *Strengthen the public recognition of Mitchell Precinct as an integral component of the Australian War Memorial and home to a significant national collection. **This can include unified corporate identity and the potential for public access and display of collection items** [author’s emphasis].*

Comment: It is impossible to reconcile the fact that the Memorial would advance to government this contention in a submission for funding to the Public Works Committee dated July 2017, while virtually simultaneously stating in the **Options Assessment Report** being prepared for release in August 2017:

The dispersed Memorial would result in the Memorial at Campbell not being considered as Australia’s “national” War Memorial, thereby lessening the importance of the Campbell site and commemorations told within (**Options Assessment Report**, section 4.2).

These statements are blatant contradictions. It needs to be shown how the Memorial Council and government can accept both as reliable and in good faith.

The issues of transport

114. A further example of questionable selectivity in the **Options Assessment Report** comes with the assertion that ‘[t]he Mitchell site is not located in close proximity to a significant transport hub, which will impact attendance’ (**Options Assessment Report**, section 4.2).
115. The use of the term ‘a significant transport *hub*’ (author’s emphasis) makes this statement effectively true, though potentially misleading.
116. By happy circumstance, in the **Options Assessment Report** a distance of two kilometres has been nominated (with no ‘industry standard’ qualification reference, just the judgement of the **Options Assessment Report** assessment team) as a ‘reasonable assisted travel distance’ (**Options Assessment Report**, section 2.5, figure 1). The ACT Light Rail civic centre hub lies just within that two kilometre figure – provided you use an ‘as the crow flies’ distance, not actual achievable on-ground distance. That is the closest point of the ACT Light Rail mass transport system to the Memorial site at Campbell.
117. The nearest ACT Light Rail route *hub* to the Mitchell Precinct (Gungahlin Centre) is more than three kilometres away. However, the nearest ACT Light Rail *station* is only about 700 metres away – and the ACT Light Rail route runs about 30 metres beyond the eastern boundary of the Mitchell Precinct.

118. In the **Treloar E (Mitchell) Project Statement 2017** (para 1.15), it is stated:

1.15 Inter-Relations with the Light Rail Project

The main interface with other projects is the interface with the development of the Canberra Light Rail Project. **This project includes the development of the light rail and duplication of Flemington Road immediately adjacent to the Treloar E site.** The key interface is that the Light Rail will be constructed with overhead wires for power supply and **this will create a barrier to the movement of new collections into the Treloar Resource Centre and with the movement of collections between the Treloar Resource Centre and main Memorial building in Campbell.** Discussions with the Light Rail Project management team have commenced to ensure that disruption to the movement of collections is minimised due to the Light Rail Project [author emphasis].

119. There are two effects of the ACT Light Rail development that strongly favour the utility of the Mitchell Precinct versus the Campbell precinct proposed development. These effects do not appear for consideration in the **Design Options** paper.
120. The *first* of these effects is improving visitor access to the Mitchell Precinct as a factor in positioning it as a major contributor to the Memorial's exhibition activities. From the **Treloar E (Mitchell) Project Statement 2017**, para. 1.15 above, while 'discussions with the Light Rail Project management team have commenced', there is no suggestion that the potential for a dedicated Light Rail stop outside the Mitchell Precinct site was raised.
121. Common sense suggests that a potential passenger load of many thousands of visitors a year, travelling at times outside the peak-hour times for Light Rail usage, would be attractive to ACT Transport to provide a stop suited to that market. It is accepted that this is speculative.
122. What is not speculative, however, is the *second* effect: that of the Light Rail power transmission wires being a major impediment to large technology object movement for the 'rotation' of LTOs between the Campbell and the Mitchell site. The transport of LTOs frequently involves over-height and over-width considerations, and in the case of aircraft in particular, both of these at the same time.
123. It is obvious that LTO rotation within the Mitchell Precinct sites, in and out of conservation needs and also possibly between buildings if only some buildings have visitor access (e.g. the Treloar Centre), will be exponentially easier than having to penetrate the Light Rail 'barrier' identified in the **Treloar E (Mitchell) Project Statement 2017** – twice at least for 'rotation' between the sites.

124. The **Design Options** report does not address the serious issues of increased difficulty and cost of LTO movement that will be essential to operation of the Campbell site in future. This reduces the quality of information presented to the Memorial Council and government.

Conclusion

125. The Memorial embarked in 1992 on a practical line of development of facilities for both storage of and access to the National Collection at its Mitchell ACT site.
126. Those objectives were significantly strengthened by the approval by the Memorial's Council in 2012 of the Mitchell Precinct Development Plan, which has resulted in the acquisition of a valuable land holding of over three hectares and the completion in early 2019 of the first of a series of planned buildings. This plan is touted as meeting the Memorial's future National Collection storage and 'Circulation' needs for 75 and more years.
127. However, the Memorial has – at the same time – proposed a major development project at the Campbell site on a basis of 'needs' that are widely contested. In view of the numerous contradictions and omissions within essential documentation, the Campbell development may well be considered to be unsafe by the Public Works Committee or in Senate Estimates.
128. The anticipated – and apparently approved by Cabinet, circumventing the normal and prudent procurement requirements for major government building projects – funding for this aspirational project, one that is unsupported by fact, legislation or demonstrated need, is a staggering \$498m.
129. The Memorial could – as is shown by its own submissions to the Public Works Committee in 2017 – very adequately meet all of the potential demands for increased facility at its Mitchell Precinct for around \$100m, or around 20 per cent of the projected cost of the highly contentious Campbell site project. However, the Memorial's documentation in support of development at the Campbell site has been constructed so as to ignore or deny the potential of the Mitchell Precinct as offering a viable and cost-effective facility for the Memorial to achieve its mission in future.
130. It is highly questionable as to whether the Memorial Council and government has been provided with sufficiently complete, comprehensive and reliable information on which to make decisions regarding the viability and efficiency of pursuing the Campbell Precinct development project, or of taking other paths.
131. Cultural institutions are always capable of developing in multiple directions – and on multiple campuses, like the Imperial War Museum's five, including [Duxford, devoted to large technology objects](#) – and alternative plans should be properly explored.
132. It is highly obvious, on the other hand, that the Mitchell Precinct Option offers a multitude of advantages, advantages that have not been adequately addressed. It remains for the Memorial – and government – to honestly address and admit these.

Appendix: Significant factors in Large Technology Object (LTO) exhibition and storage

Military LTOs have a number of important (some unique to the genre) factors that need to be taken into account in exhibiting and storing them, and therefore in planning for such.

By definition, these objects are large. They occupy significant floor space. Armoured LTOs are often very significantly heavier than a 'civilian' object of equivalent volume or footprint – though increasingly, with the use of extremely high-technology armour, that is not always such a factor.

However, both size and weight, while a critical factor in design of floors, access points, ceiling heights and loading areas, are by no means the only factors a museum facility architect, engineer, exhibition designer or storage manager needs to take into account.

Military equipment is, more often than not, manufactured to meet a military specification – not a civilian standard. Civilian standards generally focus on public safety because of legal liability. Your motor vehicle has to meet a large number of 'safety' standards, including both the safety of occupants and the safety of other users of the same space.

You can park your car anywhere (if legal) and 'the public' is not put at any greater risk of harm from the object itself than is inherent in the risk allowed by standards; the standards become the measure of 'fit for purpose' in terms of public safety.

Military equipment is intended to be contained in a military environment and those around it are expected to be trained in (or at least familiar with) its characteristics, including risks involved from proximity. Fittings and features mandated by the military requirement are sometimes (by necessity) fundamentally dangerous to a casual bystander wandering around the item, let alone (for example) children running, etc.

Apart from the fairly obvious risks, sharp edges, major projections such as barrels at head height, heavy hatches that are by design unsecured, can also be hazardous. Asbestos sheathing of hot areas is fairly obvious, but damaged modern high-tech armour may not be so obvious but may release dangerous material – and that may be unknowable to Museum staff due to the actual material being classified. Just-burned carbon fibre releases highly carcinogenic small particle residue, but few people know of this – and carbon fibre is becoming fairly ubiquitous in high-tech structures.

In short: military materiel that can be displayed in cases or using other means to create a physical barrier between the observer and the object, is 'normal'; LTOs are too big for display cases and can really only be kept (reasonably) secure by maintaining sufficient space around them as a barrier, thus artificially enlarging their exhibition footprint.

And, finally, museums need to take into account the fact that human beings have an almost unlimited ability to act stupidly or thoughtlessly, often nowadays for the sake of 'selfie' photographs. The Memorial once received, anonymously in the mail, a photo of three children all under the age of about 12 sitting astride the barrel of the Centurion Tank on display outside the Memorial with the sign saying 'DO NOT CLIMB ON THE EXHIBITS' squarely in the frame. Attached to the photo was a hand-written note, 'At least you tried – sorry'.

MITCHELL PRECINCT DEVELOPMENT PRINCIPLES

Statement of evidence to the Parliamentary Standing Committee on Public Works June 2017

Excerpts from Submission 1. Australian War Memorial, Canberra

1.11 Mitchell Precinct Development Plan Principles

1.11.1 Overview

The Mitchell Precinct Development Plan has been prepared to set parameters for the long term planning and staging strategies for the Treloar Resource Centre. It addresses the vision of the institution as well as the functional design requirements for the storage and conservation of the National Collection. The first objective has been the establishment of a series of *Site Development Principles* that will help guide future development decisions in eliminating planning conflicts and preserving flexibility. The Mitchell Precinct Development Plan *Site Development Principles* are detailed in Section 1.11.2 through to Section 1.11.10.

1.11.2 Principle 1 – Whole of Institution Consideration

The Treloar Resource Centre integrates with the functions at the main Memorial building. Any redevelopment affecting conservation and other exhibition support activities will have an impact on broader Memorial operations.

1.11.3 Principle 2 – Maximise Site Usage

The existing Treloar Resource Centre has sufficient land to accommodate another 75 years of storage growth through progressive development of higher density two level buildings.

1.11.4 Principle 3 – Design Flexible Building Storage Form

The Treloar Resource Centre must have spatial and structural flexibility to accommodate the diverse storage requirements including size and load impact, handling and movement, environmental control and security. It must be capable of responding to changes in collection type and acquisition rates over time.

1.11.5 Principle 4 – Design Flexible Building Storage Form

There is flexibility in sizing the area of each stage of development to meet funding and operational demands. The buildings should have an optimal module of 50 metres width, which relates to structural, services, crane and efficiencies of use.

1.11.6 Principle 5 – Organise around shared infrastructure and support facilities

Staged developments should be configured around a central spine to benefit from operational efficiencies of shared vehicular movement and handling yard, loading areas, plant and equipment, security staff and amenities.

1.11.7 Principle 6 – Standardise Ground Floor and Future Connections

Future buildings should share common ground level for easy connections between stages. The different ground levels to existing Treloar B and Treloar C have highlighted operational inefficiencies when moving collection items and accessing support facilities between the two.

1.11.8 Principle 7 – Environmentally Sustainable and Responsible Design

Develop holistic design solutions that consider sound planning, economy of materials, efficient use of resources and reduced maintenance and running cost. Consider building lifecycle planning where structure can last over 100 years whilst building fabric and services have shorter lifecycle of 25 years.

1.11.9 Principle 8 – Develop Precinct Wide Services Strategy

Consider a modular and extendable central plant and precinct wide services strategy that will offer energy efficiency, shared redundancy, ease of maintenance and replacement access.

1.11.10 Principle 9 – Strengthen Public Presence

Strengthen the public recognition of Mitchell Precinct as an integral component of the Australian War Memorial and home to a significant national collection. This can include unified corporate identity and the potential for public access and display of collection items.

LETTER FROM 83 DISTINGUISHED AUSTRALIANS OPPOSING THE AWM REDEVELOPMENT

23 March, 2019

The Australian War Memorial's \$498 million extensions should not proceed. They cannot be justified, they show the Memorial is being given preference over other national institutions, and the money could be better spent.

The Memorial Director, Dr Brendan Nelson, touts the Memorial as telling 'our story'. The Memorial should be revered, but Australia has many stories and Dr Nelson's excessive veneration of the Anzac story denies the richness of our history.

Dr Nelson wants added space to display more of the big artefacts representing recent, but purportedly 'forgotten' conflicts, and to 'heal' veterans. Recent conflicts should instead be presented in proportion to their significance; responsibility for veterans' welfare belongs with Defence and Veterans' Affairs.

The extensions offer Dr Nelson a permanent legacy like that of none of his predecessors. His and his Council's ambitions will destroy the Memorial's character and entail the demolition of Anzac Hall, opened in 2001 and winner of the 2005 Sir Zelman Cowen Award for Public Architecture.

The Memorial has been treated most generously by successive governments, and has suffered less from the 'efficiency dividend' that has damaged other institutions.

We have just seen over \$350 million spent by the Commonwealth on the Anzac Centenary and the Sir John Monash Centre in France. Should further money be spent on these extensions rather than on other needy cultural institutions or direct benefits to veterans and their families?

Signatories

The 83 signatories include 24 recipients of awards in the Order of Australia.

- Rob Adams, former senior executive, Australia Council
- Lorena Allam, Walkley Award winning Gamilaray Yuwalaraay journalist
- Len Amadio AO, former Director, Department of the Arts, South Australia
- Michelle Arrow, Associate Professor, Modern History, Macquarie University
- Dean Ashenden, Honorary Senior Fellow, Melbourne Graduate School of Education
- Vicken Babkenian, independent researcher, Australian Institute for Holocaust and Genocide Studies
- Paul Barratt AO, former Secretary, Department of Defence
- Joan Beaumont FASSA, Professor Emerita, Strategic and Defence Studies Centre, Australian National University
- Margaret Beavis, general practitioner, Secretary, Medical Association for Prevention of War

- Diane Bell, Emeritus Professor
- Ian Bickerton, Honorary Associate Professor, School of Humanities and Languages, University of New South Wales
- Tony Blunn AO, former Secretary of six Australian government departments
- Professor Frank Bongiorno AM FASSA
- Penleigh Boyd, architect
- Alison Broinowski AM, former diplomat and author
- Richard Broinowski, former Australian Ambassador to South Korea, Vietnam and Mexico, author
- George Browning, former Anglican Bishop of Canberra and Goulburn
- Pamela Burton, author and lawyer
- Richard Butler AC, former Australian Ambassador
- Peter Cochrane FAHA, historian
- Peter Corlett OAM, sculptor, military memorials and public works
- Martin Crotty, Associate Professor of History, School of Historical and Philosophical Inquiry, University of Queensland
- Paul Daley, author, journalist, multiple Walkley Award winner
- Joy Damousi FAHA FASSA, Professor of History, University of Melbourne
- Peter Dean, Professor of War Studies, University of Western Australia
- John Denton, architect, Denton Corker Marshall, AIA Gold Medallist
- Meredith Edwards AM FASSA FIPPA, former senior Australian government public servant, Emeritus Professor, University of Canberra
- Romain Fathi, Lecturer in History, Flinders University
- Richard Flanagan, writer, winner of the Man Booker Prize
- Bill Gammage AM FASSA, historian
- Rolf Gerritsen, Professorial Fellow, Northern Institute, Charles Darwin University, Alice Springs
- Desmond Griffin AM, Gerard Krefft Fellow and former Director, The Australian Museum
- Tom Griffiths AO FAHA, historian
- Liam Hanna, former Assistant Director, Australian War Memorial
- Marianne Hanson, Associate Professor of International Relations, University of Queensland
- David Headon, historian, Foundation Fellow, Australian Studies Institute, Australian National University
- Chris Henderson, President, Women's International League for Peace and Freedom (Australia)
- Harry Heseltine AO, Professor Emeritus and former Rector, University College UNSW (Australian Defence Force Academy)
- Carolyn Holbrook, historian, Alfred Deakin Research Fellow, Deakin University
- Douglas Hynd, Adjunct Research Fellow, Australian Centre for Christianity and Culture, Charles Sturt University

- Benjamin Jones, Lecturer in History, Central Queensland University
- Brendon Kelson, former Director, Australian War Memorial
- Thomas Keneally AO, novelist and sometime historian
- Tony Kevin, Emeritus Fellow Australian National University, author, former Australian Ambassador to Poland and Cambodia
- Marilyn Lake AO FAHA FASSA, Professorial Fellow in History, University of Melbourne
- Jack Latimore, Goori writer and researcher, reporter and columnist for *Guardian Australia*; editor, *NITV News Online*
- Archie Law, Chair, Sydney Peace Foundation
- Carmen Lawrence, Professor Emeritus and Senior Honorary Research Fellow, School of Psychological Science, University of Western Australia
- Richard Llewellyn, former Manager of Collections, Australian War Memorial
- Greg Lockhart, historian
- Peter McIntyre, architect, McIntyre Partnership, Melbourne, AIA Gold Medallist
- Stuart Macintyre AO FAHA FASSA, Emeritus Professor, School of History, University of Melbourne
- Ian Maddocks AM, physician, Senior Australian of the Year, 2013
- Mark McKenna, Professor of History, University of Sydney
- Michael McKernan, historian, former Deputy Director, Australian War Memorial
- John Menadue AO, former Secretary of four Australian government departments
- Ann Moyal AM FAHA, historian
- Douglas Newton, historian
- George Nicholls, former Director-General, National Archives of Australia
- Brett Odgers, Convenor, Canberra Chapter, Walter Burley Griffin Society
- Michael Piggott AM, Senior Research Fellow, Deakin University, former Senior Curator, Australian War Memorial
- Stuart Rees AM, Professor Emeritus, University of Sydney
- Richard Reid, former Senior Historian, Department of Veterans' Affairs
- Henry Reynolds FAHA FASSA, historian, Honorary Research Professor, University of Tasmania
- Tilman Ruff AM, physician, Associate Professor, Nossal Institute for Global Health, University of Melbourne; Founding Chair, International Campaign to Abolish Nuclear Weapons (Nobel Peace Prize 2017)
- Lyndall Ryan AM FAHA, Research Academic in History, University of Newcastle
- Sue Salthouse, ACT Citizen of the Year 2015-16
- Alex Sloan AM, journalist
- Jeff Sparrow, editor, writer and broadcaster
- Peter Stanley FAHA, Professor of History UNSW Canberra; former Principal Historian, Australian War Memorial
- David Stephens, editor, Honest History website
- Enrico Taglietti, architect, AIA Gold Medallist

- Richard Tanter, Senior Research Associate, Nautilus Institute, and Honorary Professor in the School of Political and Social Sciences, University of Melbourne
- Bob Taylor, FCA, former finance executive, Australia Council
- Alistair Thomson FASSA, Professor of History, Monash University
- Gillian Triggs, former President, Australian Human Rights Commission
- Christina Twomey FAHA FASSA, Professor of History and Head of School of Historical, Philosophical and International Studies, Monash University
- Aileen Marwung Walsh, ARC Laureate History Research Doctoral Candidate, Australian National University
- Sue Wareham OAM, President, Medical Association for Prevention of War
- Don Watson, author
- Ernst Willheim, former senior Australian government public servant
- Angela Woollacott FAHA FASSA, Manning Clark Professor of History, Australian National University
- Clare Wright, Associate Professor of History, La Trobe University

Claims of public support for the proposed \$498m Australian War Memorial redevelopment – evidence misrepresented

June 2021

Sue Wareham, President, Medical Association for Prevention of War (MAPW), and member of Heritage Guardians group

There has been a litany of processes that seem designed to produce the desired support for the AWM redevelopment, and the ignoring of results that didn't.

2018 consultation process by the AWM

- 134 people took part – a very small number
- A message was emailed to participants on 17/12/18, stating “This consultation will inform the Memorial’s detailed proposal to the Federal Government...”, and yet the redevelopment had already been formally announced by the PM on 1/11/18 (before the government had seen the detailed business case).

Nov 2019- Feb 2020 consultation sessions on EPBC (heritage) matters:

- Some organisations that were known by the AWM to have concerns about the redevelopment were not notified about the consultation sessions; venues for the sessions around the country were often RSL clubs where, one assumes, the AWM hoped for support. Even then, attendances were extremely low and most attendees opposed the redevelopment, according to reports to MAPW from attendees at a number of the sessions.
- In December 2019, MAPW expressed interest to the AWM in seeing their report on the current round of consultations when it was completed. The report was not available to MAPW (despite reminders to the Memorial) until 7 July 2020, surely long after it was completed, when it appeared in the copious EPBC referral material.
- See further information [here](#).

Feb 2020 AWM “Social Heritage Values Research”:

- See Appendix B, pages 74 onward of [this report](#), which refers to an online survey done in Feb 2020 that was part of the EPBC process.
- Only 21% of those surveyed knew anything about the redevelopment plans (page 79), only half had ever been to the AWM (page 80), and only ¼ knew much about the role and purpose of the AWM (page 81).
- See page 83 for the prompted materials about the redevelopment which were clearly designed to produce the desired results.

2020 Public Works Committee inquiry:

- 77 submissions received, the most submissions received on any PWC inquiry since it began in 1913.
- Of the 77 submissions, approximately three-quarters were against the proposal.
- See further commentary [here](#).

Feb 2021 AWM survey:

- On 24 March 2021, the AWM Director said to parliament's Foreign Affairs, Defence and Trade Legislation Committee (see page 112 [here](#)):
*"...In the last survey that we conducted [in Feb 2021], which was leading into this current process of community consultation, 4,000 people nationally were engaged about the development, about the project, about the galleries, what they'd like to see et cetera. **Only 6% of the 4,000 were opposed to the development.**"* [emphasis added]
- This is an appalling misrepresentation. The survey did not ask if people supported the redevelopment, or the destruction of Anzac Hall, or the tree removal that will accompany it all. It focussed on what type of things they would like to see in the Memorial. There were very leading questions and questions lacking essential context.
- See further commentary [here](#).

NCA inquiry into "early works", April 2021

- "Early works" = destruction of Anzac Hall, removal of well over 100 trees and major excavation at the front of the memorial – all masquerading as "early works", before the NCA has even approved the redevelopment itself
- The NCA received a total of 601 submissions for this works application, which was by far a record for submissions to the NCA on anything. Of those submissions, 3 respondents supported the works, 590 expressed concerns about some or all of the proposal; and 8 respondents provided a neutral response but raised concerns or questions.

Mainstream media commentary

- Such commentary has been overwhelmingly opposed to the redevelopment. There are very few voices in the public commentary in favour of it.
- A Canberra Times readers' poll on 29 June 2019 reported that 80% of respondents had said "Yes" to the question "Do you support the call by former War Memorial director Brendon Kelson that the proposed \$500 million expansion should be dropped?"

THE ROLE OF LARGE TECHNOLOGY OBJECTS IN THE AWM REDEVELOPMENT

The AWM has repeatedly emphasised the importance of Large Technology Objects (LTOs) in the whole redevelopment. For example:

1. The capacity to display LTOs was a key reason for the choice to destroy the existing Anzac Hall. The Memorial's [Final Preliminary Documentation](#) under EPBC, especially section 4.6.2 "*Why the Solution that retained Anzac Hall was not selected*", makes this clear.
2. The Memorial's [submission](#) to the Public Works Committee listed the display of LTOs as one of the key drivers of the project, under the heading '*Need for the project*'; see paras 2.6.1 and 2.6.3.

The [PWC report](#) at para 2.17 stated: "*The AWM told the Committee the project need has been divided into three categories:*

1. *Spatial constraints*
2. *Lack of capacity to display large technology objects*
3. *Visitor circulation challenges and compliance issues related to the Disability Discrimination Act 1992.*"

Paras 2.24 and 2.25 of the PWC report (drawn from the Memorial's submission) listed the following, along with the AWM's statement that these items are "*necessary to enable the stories of Australians who served in conflicts and operations*":

1. AP-3C Orion maritime surveillance aircraft;
2. Components from HMA Ships *Sydney (IV)* and *Tobruk*;
3. S-70A-9 Blackhawk helicopter;
4. Two F/A-18 A Hornet fighter aircraft;
5. Two Bushmaster Protected Mobility Vehicles;
6. Two Australian Light Armoured Vehicles; and
7. RF111C Reconnaissance Aircraft.

The Memorial elaborated: "*It is important that these objects are part of a conflict or operation gallery where they are a key element of the story, and not simply be displayed in a group of large technology objects away from the conflicts.*" Para 2.96 of the report says that after the redevelopment the number of LTOs will increase from 52 to an estimated 62.

3. In the [Memorial's NCA documentation](#) (Planning Report) "*large technology objects*" are mentioned at least 5 times.
4. As far back as October 2018, even before the funding of \$498m had been announced, it was clear that space considerations and LTOs were intimately connected. In Senate Estimates on 24 October 2018 (p. 167), in the context of an exchange with senators about the Memorial's need for more space, then AWM Director Dr Brendan Nelson said "*We're also acquiring a lot of very large objects from Defence that are being decommissioned at the moment, from C-130 Hercules to CH-47s and so on*". [This article](#) from ASPI's The Strategist also reinforces Dr Nelson's promotion of the need for more space for LTOs, something he did regularly. On another occasion, he [stated](#) that the F-111 would have "*pride of place*" in the new galleries.

5. Acting Director Tim Sullivan [stated](#) (as reported in early 2018) that a Chinook helicopter, a Seahawk aircraft and two F/A18s would be displayed in the proposed new space.



Australian Government
Australian Heritage Council

12 December 2019

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

To whom it may concern,

EPBC Referral 2019/8574: Australian War Memorial Redevelopment

I am writing on behalf of the Australian Heritage Council to provide a submission on the proposed Australian War Memorial Development, recently referred for decision under the EPBC Act.

The Australian Heritage Council has reviewed the referral documentation submitted by the Australian War Memorial, in particular the Heritage Impact Assessment. Based on the information provided, the Council believes the action is likely to have a significant impact on the listed National Heritage and Commonwealth Heritage values of the Australian War Memorial.

The works to the Southern Entrance of the War Memorial as currently conceived will detrimentally impact both the original fabric of the building and the experience of visitors who now enter the building through the inspiring entrance to the memorial spaces, as designed by the original architects. The addition of the rear glass atrium will also impact on the original fabric of the building, although unfortunately the design progression in the referral documentation is not sufficiently detailed to allow a clear understanding of the extent of their impact on listed heritage values. The demolition of Anzac Hall will remove a significant contributory element of the identified heritage values. In combination, and as acknowledged in the referral documentation, there is likely to be a significant negative impact on the heritage values of this outstanding Australian heritage place. The Australian Heritage Council suggests the impacts of the project on heritage values need to be more clearly articulated to allow a rigorous assessment of their effects.

The Australian Heritage Council also notes that the submission of the referral without the completion and endorsement of the 2019 Heritage Management Plan further obscures the best outcomes for the listed heritage values of the Australian War Memorial.

The Australian Heritage Council recommends that an informed assessment of impacts on the National and Commonwealth heritage values of the War Memorial would be best managed through a controlled action decision which allows for further assessment and approvals processes to be undertaken.

The Australian Heritage Council encourages the Australian War Memorial to continue to work with the Department of the Environment and Energy to ensure the proposed

redevelopment works respond appropriately to the outstanding heritage significance of the Australian War Memorial.

Should the Minister for the Environment or her delegate have any further questions about the Council's submission, please do not hesitate to contact the Australian Heritage Council at AHC@environment.gov.au

Yours faithfully

A handwritten signature in dark ink, appearing to read 'D Kemp', is centered on the page. The signature is fluid and cursive, with the first letter 'D' being large and prominent.

Dr David Kemp
Chair, Australian Heritage Council



Australian Government
Australian Heritage Council

AWM Development Project - EPBC Public
Comment
152 Submission AUSTRALIAN HERITAGE
COUNCIL

Australian War Memorial Development Project Team
GPO Box 345
CANBERRA ACT 2601
Email: development@awn.gov.au

To whom it may concern

Australian War Memorial Expansion – Preliminary Documentation Submission

I write on behalf of the Australian Heritage Council (AHC) regarding the proposed developments at the Australian War Memorial, and congratulate the Project Team for the effort that has gone into the production of the report.

While I note there are commendable reasons for the project to proceed as documented in terms of meeting the functions of the Memorial, our responsibility is to respond to the impacts on the National and Commonwealth heritage values of the site. The comments of the AHC are as follows:

1. Overall the Council notes that the entire project is predicated on the assumption that the Memorial will not be able to perform its functions unless the size of the exhibition and other areas is considerably increased. The intent of the project to acknowledge and incorporate continuing arenas of conflict and military operation is commendable.

The documentation provided, however, while addressing alternatives relating to structural expansion, appears to have not addressed options such as operational and other functional changes that could minimise the need for additional space. These include different and technological methods of interpretation and museum display, as well as opportunities to introduce a more sustainable visitation strategy. Both are important aspects of a comprehensive heritage management programme and should be considered as key approaches to improving capacity.

Physical expansion to support the display of large objects such as submarines and aircraft is not a sustainable intent over the long term and, in the current circumstances, cannot be achieved without significantly impacting listed heritage values.

2. The listed heritage values of the Memorial include its landscape and setting, and this is discussed in some detail in the documentation. While the discussion is clear on matters such as impacts on the Anzac Parade context, view lines, or the impacts on trees in the precinct, it is noted that the impacts on the landscape and micro-setting of the Memorial have not been specifically considered in terms of the accretion of proposed structural change within the Memorial site.

There is ambiguity in the response in Section 6 of the Heritage Impact Assessment (HIA) (p. 240) to the query 'Has the advice of a consultant skilled in the conservation of

...the documentation provided, however, while addressing alternatives relating to structural expansion, appears to have not addressed options such as operational and other functional changes that could minimise the need for additional space. These include different and technological methods of interpretation and museum display, as well as opportunities to introduce a more sustainable visitation strategy. Both are important aspects of a comprehensive heritage management programme and should be considered as key approaches to improving capacity.

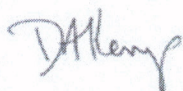
heritage landscapes been sought? If so, have their recommendations been implemented?'. In its assessment, the document omits consideration of the impact on the heritage landscape of the expansion of the C.E.W. Bean Building (included as a Variation to the original referral). While the assessment concludes that the larger structure has a positive impact in providing increased space, as noted in point 1 above, it does not consider the negative impact of the expanded footprint on the heritage landscape and setting through the reduction of 'natural' space. This action imposes a considerable impact on and imbalance of landscape design within the site, and can be seen to compromise the relationship between the natural bushland setting of the Memorial and its continuity with Mount Ainslie.

While we note there is a reference to these concerns in the HIA (page 57) that 'care must be taken to ensure the landscape qualities of the eastern precinct are not overly diminished', this fails to acknowledge that the proposed expansion already has this effect.

3. While the documentation, and particularly the HIA, provide a detailed response to individual actions, the combined impacts of the works is less well considered. It is the holistic impact of the proposed changes that is of concern in terms of the listed heritage values, including the landscape and setting. A comparison of Figures 2.1 and 5.1b (pages 8 and 33 of the Submission) highlights the complexity and extent of the combined actions and the alterations to the heritage landscape (which includes all aspects of the Memorial structure). This comparison clearly shows the loss of natural areas to designed and constructed spaces and the full extent and design changes arising from the redevelopment of the Parade Ground area.
4. In addition the Council notes the following individual actions as having negative impacts on Listed Heritage Values that should be seriously reconsidered:
 - The demolition of the existing Anzac Hall (identified in the HIA as having a substantial negative impact)
 - The redesign and expansion of the Parade Ground
 - The inclusion of the Oculus - principally in terms of the removal of a direct line of access into the AWM building
 - The inclusion of an external lift
 - The expansion of the C.E.W. Bean building.

Regrettably the Council cannot support the conclusion that the proposed redevelopment will not have a serious impact on the listed heritage values of the site and recommends that the matters above be given serious attention.

Yours sincerely



The Hon Dr David Kemp AC
Chair
31 July 2020



ACT Heritage Council

File Reference: Campbell-S39-B3

Contact Officer: DF

Phone: 13 22 81

Due Date: 13 December 2019

Mr Mike Smith
Director, Southern NSW & ACT Assessments
Environment Approvals and Wildlife Trade Branch
Department of the Environment and Energy
Mike.Smith@environment.gov.au

Dear Mr Smith

Additions and Alterations to the Australian War Memorial

On 19 November 2019 the ACT Heritage Council (the Council) was sent an invitation to comment on an action under the *Environment Protection and Biodiversity Conservation Act 1998* for extensions to the Australian War Memorial, a place registered on the Australian National Heritage List. Further information on the matter was also referred to the Council on 29 November 2019.

The ACT Heritage Council is an independent statutory authority convened by the ACT Government under the *ACT Heritage Act 2004* (the Act) to manage heritage places registered under this Act. It comprises subject experts in a range of disciplines related to heritage, design and planning. While the Act does not apply to the proposed development, the Council identifies itself as an interested party and seeks to comment on the potential heritage effects of the proposal

The Council notes that this referral did not include a full set of sketch plans for the proposal, however, sufficient plans and renderings were included in the report to indicate a broad appreciation of the concept.

Accordingly, while Council cannot provide a full and detailed response to the proposal until detailed plans are provided, the following initial comments can be made.

One of the most important aspects of the building, as an evocative tomb/memorial rather than just a museum, has been the ability to perceive it 'in the round' as originally intended by Emil Sodersten and John Crust (and as noted in the National Heritage List description).

The works to the front of the building appear to be a reasonably unobtrusive response to the issues created by the current entrance to the building and the Council considers that they will not diminish heritage values provided that they do not cause damage to the fabric of the building. The Council appreciates that the building entrance is a pinch point at present, and the new entry will address this by separating the entrance function

from the ceremonial forecourt and creating a new experiential entrance for visitors. In addition, the new arrangement does not diminish significant vistas to and from the Parliamentary Triangle, or to Mount Ainslie.

However, the new ANZAC Hall to the rear of the building is not supported by the Council, as it would have substantial heritage impacts.

Firstly, the proposed demolition of the existing ANZAC Hall would diminish the heritage significance of the Memorial and its precinct. ANZAC Hall was completed in 2001 and in 2005 was awarded by a national awards' jury of the Australian Institute of Architects its Sir Zelman Cowan Award for Public Architecture. The building was praised for its sensitivity to the heritage and cultural values of the Sodersten and Crust designed Memorial.

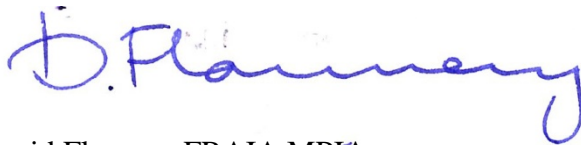
Secondly, the proposed new ANZAC Hall is a visually intrusive structure which removes access to one entire side of the building and breaks the visual connection to Mount Ainslie. It requires the demolition of a number of other highly regarded previous extensions and structures and is over-large, overpowering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

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

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

Further, the Council requests that future consideration of this proposal, or any future amended proposal, be referred to the Council for comment.

Yours sincerely



David Flannery FRAIA ~~MPIA~~
Chair (as delegate for),
ACT Heritage Council

13 December 2019



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11 December 2019

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

*Heritage*Guardians

Equity for our cultural institutions

Some slices of salami are thicker than others: being played for mugs

Introduction

This note is to assist analysis of [the current early works approval application from the War Memorial to the National Capital Authority \(NCA\)](#). The works covered include the demolition of Anzac Hall, a massive excavation at the front of the Memorial, and removal of dozens of trees.

‘Salami slicing’ is a rorting or gaming of an approvals process, where the approving authority is encouraged to approve ‘early works’ of such importance that it will be impossible for the approving authority (in this case, the NCA) not to approve later components of the project when applications for those components are made. Indeed, the early works approvals in such cases make no sense unless it is assumed that later approvals will follow.

Precedent

There has already been salami slicing in the \$498m War Memorial project. When the NCA considered an early works application from the Memorial for carparking, [it approved the application](#) on the basis that the carparking was ‘the first of the permanent works forming part of the broader redevelopment project’ but was, at the same time ‘an independent structure, **not physically connected to the larger redevelopment project** and is therefore able to be considered as a separate project’ (emphasis added).

[These components are physically connected to the larger project; indeed, they are fundamental to it](#)

Leaving aside the semantic gymnastics in the NCA’s carparking decision, it is simply impossible to see Anzac Hall demolition, the excavation, and the tree removal, as ‘not physically connected to the larger development project’. In fact, all three components are fundamental to the project as a whole:

- Anzac Hall has to be demolished to enable the construction of a new, two level Anzac Hall, a central component of the whole project (Main Works Package 3 in [the Planning Report lodged with the application](#)).
- The excavation around the Southern Entrance to the Memorial is essential to allow construction of a new entrance and reconstruction of the Parade Ground, both key components of the project (Main Works Package 1).
- The removal of at least 65 (probably up to 100) trees is essential to allow construction of a new entrance and reconstruction of the Parade Ground, and extension of the CEW Bean Building (Main Works Package 2), all key components of the project.

The Memorial's justifications for salami slicing

Responding to Heritage Guardians' criticism earlier this year, a senior War Memorial officer gave these justifications for what we called salami slicing, but what the officer called 'separating early and main works packages':

- de-risks the main works contract by mitigating time, cost and scope risks for e.g., rock encountered during excavation, unexpected levels of soil contamination or services relocations;
- allows more flexible contract terms that avoid excessive delay charges or scope-change costs;
- creates opportunities for a broader range of contractors to be involved in the project;
- allows the project to commence while work is still being done on finer details of design or finishes for individual elements.

The Memorial's justifications are not credible

These justifications might apply to small preliminary works but cannot apply to fundamental works like Anzac Hall demolition, the southern excavation, and wholesale destruction of trees. The contrast is evident from this list of works covered by the early works application (page 6 of the Planning Report): installation of project perimeter hoardings; services capping and relocations; new timber workshop entry door and path into the existing Bean Building; **demolition of Anzac Hall**; new roundabout to Poppy's Carpark entry road; civil works, earth retention system and **bulk excavation** (emphasis added).

The incongruity of the bolded items in that list is obvious: it is the destruction of an award-winning building less than 20 years old, and costing \$20m in today's dollars, alongside the erection of a fence; it is the excavation of hundreds of square metres of historic earth alongside knocking up a new door and pathway. The NCA – and Australians – are played for mugs by arguments like this.

The National Capital Plan does not provide an excuse

At page 6 of the Planning Report we are told, 'guidelines in the National Capital Plan (NCP) do not relate to the works proposed under this application'. If that is indeed the case, it suggests there is a deficiency in the NCP, one that allows fundamental components of a project – like the Anzac Hall demolition, the southern excavation, and the tree massacre – to be sneaked through as early works. The NCP deficiency should be remedied forthwith.

David Stephens for Heritage Guardians

22 March 2021