



John Gorton Campus Carpark

Heritage Impact Assessment

Final Report

Prepared for KPMG on behalf of the Department of Finance

October 2022



Acknowledgement of Country

We respect and acknowledge the First Nations of the lands and waterways on which we live and work, their rich cultural heritage and their deep connection to Country, and we acknowledge their Elders past and present. We are committed to truth-telling and to engaging with First Nations to support the protection of their culture and heritage. We strongly advocate social, cultural and political justice and support the Uluru Statement from the Heart.

Report register

The following report register documents the development of this report, in accordance with GML’s Quality Management System.

Job No.	Issue No.	Notes/Description	Issue Date
20-0058B	1	Draft Report — Responding to Revised Design issued November 2021	17 November 2021
20-0058B	2	Final Draft Report	24 November 2021
20-0058B	3	Final Report	23 May 2022
20-0058C	4	Revised Draft — Responding to Revised Design issued September 2022	12 October 2022
20-0058C	5	Revised Final Report — Responding to Revised Landscape Design issued 12 October 2022	13 October 2022
20-0058C	6	Revised Final Report	18 October 2022

Quality assurance

The report has been reviewed and approved for issue in accordance with the GML quality assurance policy and procedures.

Right to use

GML grants to the client for this project, and the client’s successors in title, an irrevocable royalty-free right to reproduce or use the material from this report, except where such use infringes the copyright or moral rights of GML or third parties.

Copyright

Pre-existing copyright in images and other matter is acknowledged where appropriate. Although a reasonable effort has been made to obtain permission to reproduce copyright material, GML Heritage does not warrant that permission has been obtained in all cases.

Cover image

Aerial view of Parliamentary Zone, Canberra. (Source: © Nearmap; reproduced with permission)

Executive summary

GML Heritage Pty Ltd has been engaged by KPMG on behalf of the Department of Finance to prepare a Heritage Impact Assessment for the proposed development of a multistorey carpark adjacent to the John Gorton Building, in the Parliamentary Zone.

This Heritage Impact Assessment finds that the proposed action would be likely to have a **significant impact** on the heritage values of the Parliamentary Zone. It identifies that there would be **moderate** heritage impacts on the John Gorton Building, and **low-moderate** heritage impacts on Kings Avenue.

The impacts of the action have been minimised through a process of design development and consideration of alternatives. Some residual heritage impacts remain.

The proposed structure would:

- be a permanent and irreversible addition to the Parliamentary Zone, adjacent to the John Gorton Building;
- be large scale in the setting and context; and
- be of moderate intensity because of its physical and visual presence in the sensitive landscape.

The key relevant heritage values of the project area are:

- the site's importance as a planned cultural landscape in which the architecture and open spaces create and reflect the dignity, status and function of the national capital within the National Triangle. Elements of this importance include:
 - the size, design and materiality of key buildings and their location both in the landscape and in relation to other buildings, creating a landscape of building masses within planned open parkland space;
 - the primacy of buildings which are symbolic of Australian politics and government within the landscape, serving to symbolise Australian democracy and demonstrate the legislative, executive and judicial arms of government.
- the significance of the John Gorton Building as an example of the inter-war Stripped Classical style;
- the geometry of the layout of the Parliamentary Zone, including the use of Kings Avenue to help shape the significant planned and balanced landscape; and
- key views and vistas which shape and draw focus to important landscape features such as the Parliamentary Vista, the land axes, views north and south along Kings Avenue.

The proponent, the Department of Finance, should refer the proposed development and the final Heritage Impact Assessment to the Minister for the Environment under the *Environment Protection and Biodiversity Conservation Act 1999*.

The following measures are suggested for the project team to mitigate the heritage impacts of the proposed design and development (the proposed action).

- **Consider alternative building materials and/or colours** to further maximise the opportunity to reflect the Parliamentary Zone’s established architectural characteristics.
- **Consider opportunities to further reduce height and mass through design change** to mitigate a highly impactful element of the proposed action.
- **Consider opportunities to achieve balanced road alignments** through a whole of environment planning for the Parliamentary Zone.
- **Protect historically significant trees** during demolition, excavation and construction activities.
- **Interpret the layered and historically significant landscape.**

Contents

1	Introduction	1
1.1	Background	1
1.2	Site Identification.....	1
1.3	Heritage Status	3
1.4	Statutory Context	4
1.4.1	<i>Environment Protection and Biodiversity Conservation Act 1999 (Cth)</i>	4
1.4.2	National Capital Plan.....	6
1.4.3	Campus Strategy	9
1.5	Methodology.....	9
1.6	Key Documentation and References	10
1.7	Limitations	11
1.8	Endnotes	11
2	Understanding the Place	12
2.1	Introduction	12
2.2	General Description	12
2.3	Heritage Values	14
2.3.1	Listed Heritage Values	14
2.3.2	Other Relevant Heritage Values	17
2.3.3	Indigenous Heritage Values	22
2.3.4	Summary of Relevant Heritage Values	22
2.4	Heritage Management Plan Guidance.....	23
2.5	Endnotes	28
3	Proposed Action	29
3.1	The Proposal.....	29
3.1.1	Proposed Scale and Function.....	31
3.1.2	Proposed Materials and Design.....	33
3.1.3	Proposed Siting.....	34
3.1.4	Proposed Access	36
3.1.5	Proposed Landscaping and Tree Removal.....	38
3.2	John Gorton Building Campus Masterplan	44
3.3	Alternatives to the Proposed Action.....	45

3.3.1	Commentary on Heritage Impacts of Alternative Design Options	48
3.4	Endnotes	54
4	Heritage Impact Assessment	55
4.1	Introduction	55
4.2	Method for Assessing Heritage Impacts	55
4.2.1	Grading the Scale of Impact.....	55
4.3	Assessment of Impacts.....	57
4.4	Significant Impact Determination	64
4.4.1	Summary Heritage Impact Statement.....	67
4.5	Report Summary	67
4.5.1	Recommendations—Design and other mitigation measures.....	68
4.6	Endnotes	70
	Appendix A—Exploration of Alternatives	71
	Appendix B—Historical Analysis of the Development Area’s Tree Plantings	80
	Appendix C—Heritage Places, Values and Policies	84
	Parliamentary Zone Context: Heritage Places, Values and Management Policies	84

1 Introduction

1.1 Background

GML Heritage Pty Ltd (GML) has been engaged by KPMG on behalf of the Commonwealth Department of Finance to prepare a Heritage Impact Assessment (HIA) for the proposed development of a multistorey carpark (the 'proposed action'), adjacent to the John Gorton Building, in the Parliamentary Zone (PZ).

The purpose of the HIA is to assess the potential impacts of the proposed action on the heritage values present within the Parliamentary Zone, in particular the National and Commonwealth Heritage listed values of the area, and any other heritage values on Commonwealth land. The HIA also provides mitigation measures to be addressed by the project team to assist in reducing or avoiding impacts.

This assessment follows the provision of previous heritage advice, as follows:

- Preliminary Advice Memo dated 15 December 2020, provided to the project team—KPMG, the Department of Finance and architects BVN—about heritage issues and potential impacts associated with the development area and advice for compliance with the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act); and
- Two previous HIAs for a different design of the carpark design, August 2020 and May 2022.

1.2 Site Identification

The proposed development area is in the National Triangle and the Parliamentary Zone (Figure 1.1), directly east of the John Gorton Building.

The National Triangle is the heart of the Griffins' plan for Canberra and is defined by three avenues: Kings, Commonwealth and Constitution Avenues. This triangle intersects the Land Axis from Mount Ainslie through Capital Hill (Parliament House) to Bimberri Peak and includes the Central Basin of Lake Burley Griffin. Today the Triangle is the site of public parks, green spaces, key government buildings and national institutions.

The Parliamentary Zone is a key-hole shaped area of land which has a pre-eminent role in the National Capital and is considered Australia's most significant and symbolic public space (Figure 1.1).

The development area is currently occupied by a surface carpark which lies east of the John Gorton Building, south of King Edward Terrace, west of Kings Avenue and north of King George Terrace (Figure 1.2).



Figure 1.1 Aerial photograph of the 'central national area' of Canberra identifying the National Triangle (white outline), Parliamentary Zone (blue dash) and Parliament House Vista (red outline) with the proposed site for development (black circle). (Source: Nearmap with GML overlay, 2020)



Figure 1.2 Aerial photograph of the John Gorton Building area with key roads identified and the approximate area of development indicated (black dash) (Source: Nearmap GML overlay, 2021)

1.3 Heritage Status

Under the EPBC Act, actions taken on Commonwealth land must consider impacts to the ‘whole of environment’, which includes all heritage values of the place. The development location is within the Parliamentary Zone, which is classified as Commonwealth land under the EPBC Act. It is also within the Parliament House Vista and adjacent to the John Gorton Building, two places included on the Commonwealth Heritage List, which lists heritage on Commonwealth land. There are many other listed National and Commonwealth Heritage places and nominations in the Parliamentary Zone, which have further relevant heritage values. Table 1.1 lists these places and Figure 1.3 shows the location of the places in the Parliamentary Zone.

Table 1.1 Development area context—National and Commonwealth Heritage Places in the Parliamentary Zone.

Place Name	Heritage List	Status/ID
John Gorton Building	Commonwealth Heritage List	Listed/105472
Parliament House Vista	Commonwealth Heritage List	Listed/105466
Treasury Building	Commonwealth Heritage List	Nominated/106258
Edmund Barton Offices	Commonwealth Heritage List	Listed/105476
Old Parliament House and Curtilage	National and Commonwealth Heritage Lists	Listed/ 105774 and 105318
Old Parliament House Gardens	Commonwealth Heritage List	Listed/105616
High Court and National Gallery Precinct	National and Commonwealth Heritage Lists	Listed/105745 and 105544
National Rose Gardens	Commonwealth Heritage List	Listed/105473
National Land Roads	Commonwealth Heritage List	Nominated/106324
Lake Burley Griffin and Adjacent Lands	Commonwealth Heritage List	Listed/105230

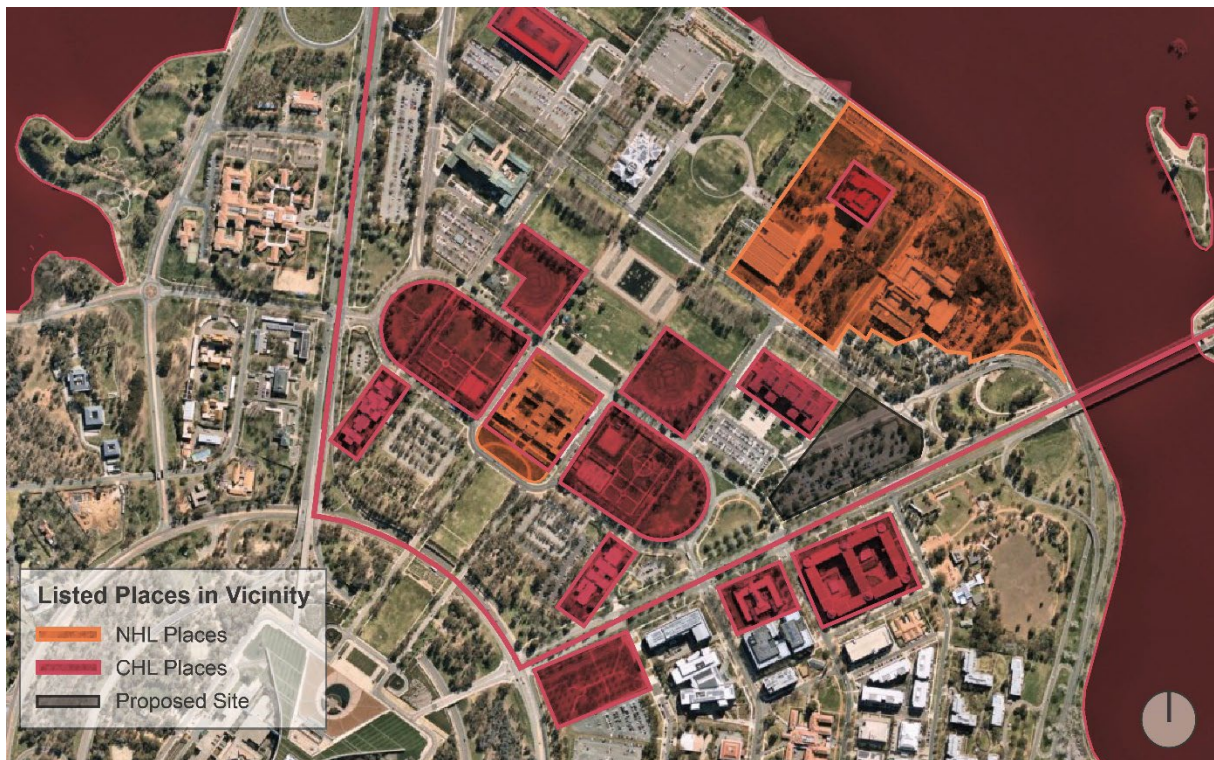


Figure 1.3 Development area context—An Aerial photograph identifying the proposed development area with heritage places, CHL places (red), including the red-boundary line of the Parliament House Vista, and NHL places (orange). (Source: Nearmap with GML overlay 2020).

1.4 Statutory Context

1.4.1 *Environment Protection and Biodiversity Conservation Act 1999 (Cth)*

As a Commonwealth-owned property, the proposed development area is subject to the provisions of the EPBC Act and the Environment Protection and Biodiversity Conservation Act Regulations 2000 (Cth) (EPBC Regulations).

Protected matters under the EPBC Act are the nine matters of national environmental significance (MNES); the environment on Commonwealth land, and the environment in general, from actions by Commonwealth agencies.

Matters of National Environmental Significance (MNES) and other Protected Matters

The EPBC Act protects, among other things, matters of national environmental significance (MNES). The National Heritage values of National Heritage places are one of nine specifically defined MNES under the Act. In the Parliamentary Zone there are two

National Heritage places—the High Court-National Gallery Precinct, and Old Parliament House and Curtilage. There are also nominated heritage places within the Parliamentary Zone and National Triangle. Recognising the precautionary principle of the EPBC Act (Section 391), the heritage values of the nominated places have been identified as relevant heritage considerations as part of this report.

The application of the precautionary principle, as part of ecologically sustainable development, is that:

Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.¹

The EPBC Act also protects the whole of the environment on Commonwealth land, and the environment in general from actions by Commonwealth agencies. The 'environment' includes all heritage values of a place, which are defined as the place's natural and cultural environment having aesthetic, historic, scientific or social significance, or other significance, for current and future generations of Australians. Consequently, all heritage values on Commonwealth land, whether listed or not, are protected under the EPBC Act.

To assist in identifying heritage on Commonwealth land, the EPBC Act established the Commonwealth Heritage List (CHL). However, heritage values may exist on Commonwealth land without being included in the Commonwealth Heritage List, including in nominated Commonwealth and National Heritage places.

Anyone proposing to take an action which is likely to have a significant impact on the National Heritage values of a National Heritage place, or the environment in general if the action is occurring on Commonwealth land or being taken by a Commonwealth agency, must refer the proposed action to the Minister for the Environment for approval.

Obligations on Commonwealth Agencies

Under the EPBC Act, the Department of Finance and the NCA, as Commonwealth agencies, must assist the Minister for the Environment and the Australian Heritage Council to identify, assess and monitor the heritage values of Commonwealth and National Heritage places, and protect, conserve and transmit the heritage values of places it owns and manages through preparing heritage management plans (HMPs). The management of Commonwealth and National Heritage places should also respect all heritage values of the place.

The agency must ensure that it does not take any action that has, will have, or is likely to have a significant impact upon the heritage values of any place in its ownership or control, unless there is no feasible or prudent alternative to taking that action, and that all measures that can be reasonably taken to mitigate the impact are taken.

Relevant sections of EPBC Act include the following:

- **Section 15B** relates to approval of actions affecting a National Heritage place.
- **Section 26** relates to approval of any action on Commonwealth land that has, will have, or is likely to have, a significant impact on the environment.
- **Section 28** relates to approval of actions undertaken by a Commonwealth agency (such as Defence) which will, or are likely to have, a significant impact on the environment. The term 'environment' encompasses the whole of the environment, including environmental matters that are not necessarily formally listed.
- **Section 34** defines the matters to be protected by the provisions of Part 3 of the Act, relating to national environmental significance and the environment in general.
- **Section 431ZC** requires the minimisation of adverse impacts to the heritage values of a National or Commonwealth Heritage place. This may be direct impacts from physical disturbance, or secondary impacts from activities that would impact the visual aspect, cultural importance, landscaping and curtilage of an adjacent listed property.

1.4.2 National Capital Plan

The Commonwealth *Australian Capital Territory (Planning and Land Management) Act 1988* (PALM Act) establishes the requirements for the National Capital Plan (NCP) and its administration by the National Capital Authority (NCA). It is a strategic planning document for Canberra and the ACT and specifies areas of land that have 'special characteristics of the National Capital'.

Section 2.4 of the NCP states that the NCA will consider all heritage places in Designated Areas as Commonwealth Areas for the purposes of protecting the environment in the manner currently afforded under the EPBC Act unless they are managed by the ACT Government and included in the ACT Heritage Register.

The proposed development area is located within the boundaries of a Designated Area—the Parliamentary Zone—and as such an NCP precinct code applies and provides a range of controls and guidelines for new development.

Parliamentary Zone Precinct Code

The Parliamentary Zone Precinct Code of the NCP contains objectives and principles relevant to the area of the proposed development, which together should be considered when designing and undertaking the project. These have been summarised below.

Objectives for the Parliamentary Zone Precinct

The Parliamentary Zone will be given meaning as the place of the people, accessible to all Australians so that they can more fully understand and appreciate the collective experience and rich diversity of this country.

To do this, the place of the people must reflect:

- the political and cultural role of Australia’s Capital
- federation and Australian democracy
- the achievements of individual Australians in all areas of endeavour
- the diversity of Australia, its peoples, natural environments, cultures and heritage
- the unique qualities of Australian creativity and craftsmanship.

It must have:

- a sense of scale, dignity and openness
- a cohesive and comprehensible layout
- a large forum for public ceremony and debate
- intimate, enjoyable spaces for individuals and regions

To realise the Parliamentary Zone as the place of the people, the Code identifies additional objectives and associated intentions (Table 1.2).

Table 1.2 Objectives and Intentions of the Parliamentary Zone Precinct Code.

Objective	Intentions
Balance politics and culture	<ul style="list-style-type: none"> • locate national cultural institutions and key government agencies in the place of the people
Welcome people	<ul style="list-style-type: none"> • provide spaces that are pleasant and sheltered • provide visitor-friendly public transport and car parking • discourage through-traffic and encourage pedestrians and cyclists
Celebrate Australian history and society	<ul style="list-style-type: none"> • foster a sense of affinity and attachment to the National Capital • conserve the unique heritage of the Parliamentary Zone for future generations
Represent Australian excellence	<ul style="list-style-type: none"> • encourage the exemplary use of Australian innovation, creativity and diversity • use Australian materials and craftsmanship • demonstrate sustainable management practices

Objective	Intentions
Emphasise the importance of the public realm	<ul style="list-style-type: none"> • adopt leading practice design and architecture • encourage pedestrian activity • improve the amenity of the open spaces • establish a variety of public spaces that will support a range of activities • establish a hierarchy of public spaces with the Land Axis as the principal space
Make access easy and open	<ul style="list-style-type: none"> • provide a comprehensive system of paths, cycleways and roads • ensure that design is barrier free • locate car parks where they are central, safe and secure • establish well signed, convenient routes to major destinations
Reinforce the integrity of the visual structure	<ul style="list-style-type: none"> • maintain the integrity and prominence of the Land Axis • symbolically recognise the intersection of the Land Axis and Water Axis • emphasise Commonwealth and Kings Avenues as landscape edges • align buildings normal to the Land Axis and Water Axis and to the Griffins’ proposed terraces • enhance the existing character and quality of the landscape • plant trees to reflect seasonal changes
Strengthen the relationship between buildings and landscape	<ul style="list-style-type: none"> • provide ordered settings and relate buildings of similar functions, using the existing buildings as the focus • locate a central court for each development region • provide clear address and identity for all buildings from the central court • align buildings normal to the Land Axis and Water Axis • establish vistas from the Land Axis to the central development courts • enhance seasonal, day and night landscape settings for buildings
Create a variety of urban spaces	<ul style="list-style-type: none"> • establish a sequence of spaces that range from the Land Axis to the development courts • link buildings and places with a legible road and pathway network

Objective	Intentions
Establish comprehensive design management policies for the future.	<ul style="list-style-type: none"> • reserve sites for new buildings • plan for a mix of appropriate future functions and land uses • develop sustainable environmental management practices • conserve the unique heritage of the Parliamentary Zone for future generations

1.4.3 Campus Strategy

The NCP encourages the development of ‘identifiable precincts’ or ‘campuses’ within the Parliamentary Zone to ‘provide a sensible and flexible rationale for the location of new buildings, public spaces...’.² The origin of the campus strategy was described in the NCA’s *Parliamentary Zone Review Outcomes* report prepared in 2000. The strategy was developed further in *The Griffin Legacy* prepared by the NCA in 2004, and is now a cornerstone of the NCP for the Parliamentary Zone. The intention is to use the existing buildings as anchors for new developments that have compatible functions.

The John Gorton Building campus (area C in Figure 1.4) is intended to facilitate the future growth of government agencies through the development of a low-scale structured carpark and new office buildings adjacent to the John Gorton Building.

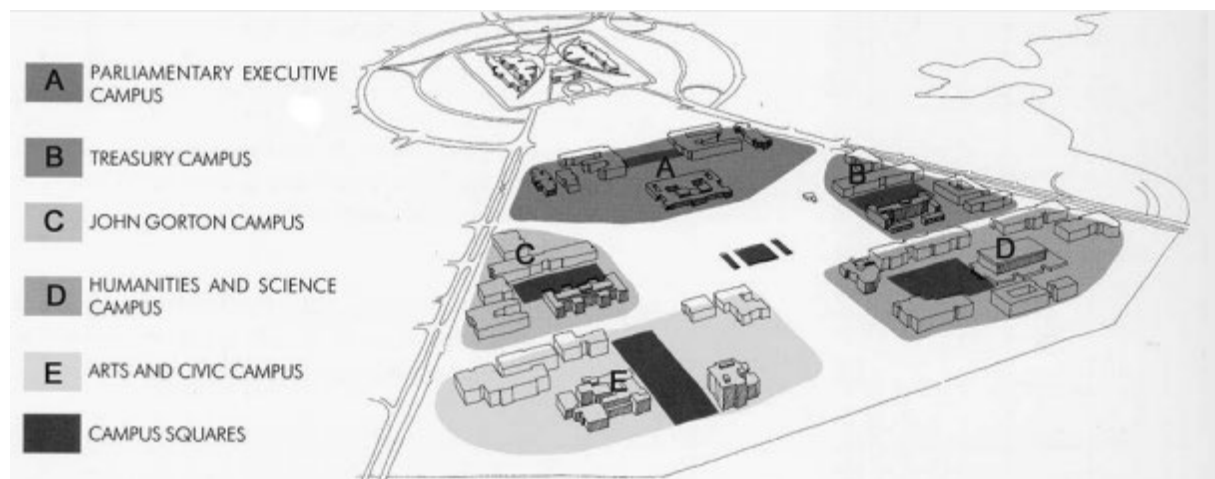


Figure 1.4 The five suggested campuses in the National Capital Plan. (Source: National Capital Plan, April 2021 revision, Figure 15)

1.5 Methodology

GML’s impact assessment methodology has been adapted from the Commonwealth’s Significant Impact Guidelines 1.1—Matters of National Environmental Significance (Significant Impact Guidelines 1.1.) and Significant Impact Guidelines 1.2—Actions on, or

impacting upon, Commonwealth land and Actions by Commonwealth Agencies (Significant Impact Guidelines 1.2). These guidelines were developed to assist proponents respond to the EPBC Act.

These guidelines are for a proponent undertaking a self-assessment of a proposed action to determine whether an action is likely to have a significant adverse impact on heritage values on Commonwealth land, the environment in general, or National Heritage values, and to understand whether a proposal needs to be submitted for approval by the Minister for the Environment under the EPBC Act.

This report has been prepared in accordance with The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance, 2013 (the Burra Charter). The Burra Charter outlines a nationally recognised process of conservation principles and processes, which is closely aligned to the Commonwealth Heritage management principles.

1.6 Key Documentation and References

This HIA has been prepared in response to:

- John Gorton Campus Carpark External Works and Landscaping, prepared by Oxigen for the National Capital Plan, 22 August 2022 and updated drawings dated 12 October 2022;
- John Gorton Carpark Landscape Works Schedule Issue 4, prepared by Oxigen, August 2022;
- John Gorton Building Carpark Design Report: VM Update 20 September 2022 (noting the earlier draft Design Reports of 16 December 2021, 2 November 2021, 23 April 2021 and 26 February 2021);
- John Gorton Carpark drawings prepared by GHD, dated 27 July 2022;
- design presentation by BVN to the Department of Agriculture, Water and the Environment, 15 November 2021;
- John Gorton Building and Communications Centre, Parkes, ACT, Heritage Management Plan (HMP), dated June 2014 (and multiple HMPs listed in Appendix C);
- Preliminary Heritage Advice: Proposed Multistorey Carpark, prepared by GML Heritage for KPMG and BVN, dated 15 December 2020;
- *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act);
- Environment Protection and Biodiversity Conservation Regulations 2000 (EPBC Act Regulations);
- EPBC Act Significant Impact Guidelines 1.1 and 1.2;

- *Design in Context, Guidelines for Infill Development in the Historic Environment*, NSW Heritage Office and the Royal Australian Institute of Architects NSW Chapter, 2005; and
- the *Australia ICOMOS Burra Charter, 2013* (Burra Charter)—the Burra Charter and the associated series of Practice Notes provide a best practice standard for managing cultural heritage places in Australia.

1.7 Limitations

This HIA and its findings are based on a review of the external works and landscaping (22 August 2022 Oxigen and 12 October 2022), John Gorton Carpark drawing package (20 Sept 2022 BVN) and road alignments drawings (27 July 2022 GHD).

This HIA relies on existing listing information and does not contain any new assessments of historic heritage values against the National or Commonwealth Heritage criteria for places on Commonwealth land.

1.8 Endnotes

- ¹ Report of the United Nations Conference on Environment and Development, Rio de Janeiro 1992, Annex I
<https://www.un.org/en/development/desa/population/migration/generalassembly/docs/globalcompact/A_CONF.151_26_Vol.I_Declaration.pdf>
- ² The National Capital Authority, National Capital Plan, p58, viewed 16 March 2021
<https://www.nca.gov.au/sites/default/files/National%20Capital%20Plan_rev%20November%202020.pdf>

2 Understanding the Place

2.1 Introduction

To consider the potential impacts from any action to a heritage place, it is important to first understand the heritage values of the place. This section outlines the identified and listed National and Commonwealth Heritage values in the vicinity of the proposed development area, and other heritage values of the place.

It also provides the planning and heritage management policy context that is relevant to the proposed action with reference to relevant HMPs associated with the places near the development area.

2.2 General Description

The proposed development area is currently a surface carpark with 275 car spaces. Dorothy Tangney Place runs northeast to southwest, parallel with the John Gorton Building.

The John Gorton Building has nine storeys, including two basement levels, six above-ground floors and a rooftop plant room. It has a core of a central rectangular block, with eight symmetrical projecting wings. The building is clad in pink granite on the ground floor and sandstone on the upper floors. The elevations are divided into vertical bays, with expressed portico and restrained spandrels between the storeys which emphasise verticality.

Local and introduced tree species of varying ages have been planted across the development area, particularly along Kings Avenue, King Edward Terrace and Dorothy Tangney Place.

Numerous mature trees line King Edward Terrace, Dorothy Tangney Place and the open spaces to the south of the John Gorton Building; these remain from the extensive planting that was undertaken during the 1910s and 1920s, as a realisation of T.C.G Weston's vision for the federal capital site.¹ Charles Weston, horticulturalist and arboriculturalist, worked in Canberra between 1913 to mid-1920s as Officer in Charge of Afforestation, Director of City Planning and Superintendent of Parks and Gardens. A 1928 map of the planting scheme (attributed to Weston) identifies the locations and species planted in the Parliamentary Zone, including the trees located in the development area—refer to Figure 2.3.

At the development area, Weston's design included planting trees in a large oblong shape around the landscape block defined in the Griffin Plan which is now the location of the

John Gorton Building. The Administration Building (John Gorton Building) was later built within this shape. The large oblong was defined by three rows of trees—Plane trees (*Platanus orientalis*), Californian Incense cedars (*Calocedrus decurrens*) and Pin oaks (*Quercus palustris*). Weston also planted the 'D' shaped elements along the north-western side of Kings Avenue. The effect of these plantings was to define the geometry of the Griffin Plan and create a series of outdoor 'garden rooms'.²

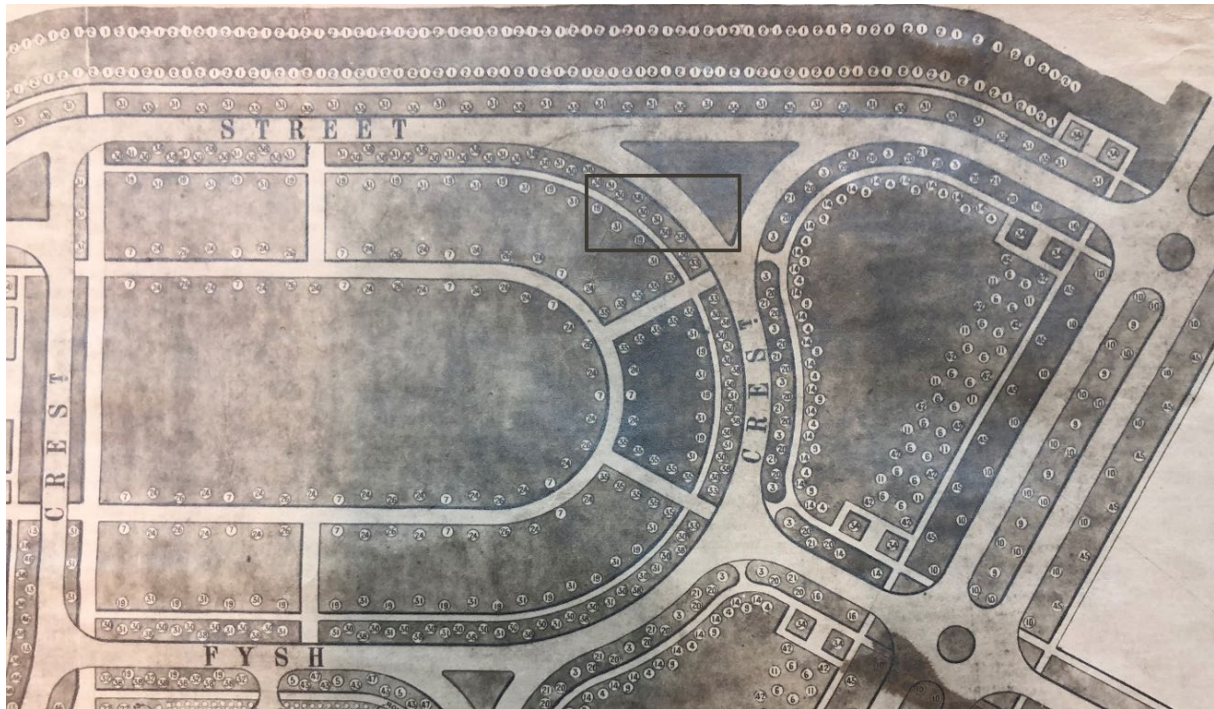


Figure 2.1 1928 plan of the planting scheme at the development area. Refer to detail below for numbering information. (Source: National Library of Australia, Bib ID: 109644)



Figure 2.2 Detail of the numbering to identify species.

Table 2.1 Planting key from 1928 planting plan.

1928 Key	1928 Species Name
19	<i>Cupressus Lawsoniana</i> (no longer extant)
30	<i>Libocedrus decurrens</i> (now known as <i>Calocedrus decurrens</i>)
31	<i>Platanus orientalis</i> (identified on site as London Planes)
38	<i>Quercus palustris</i>

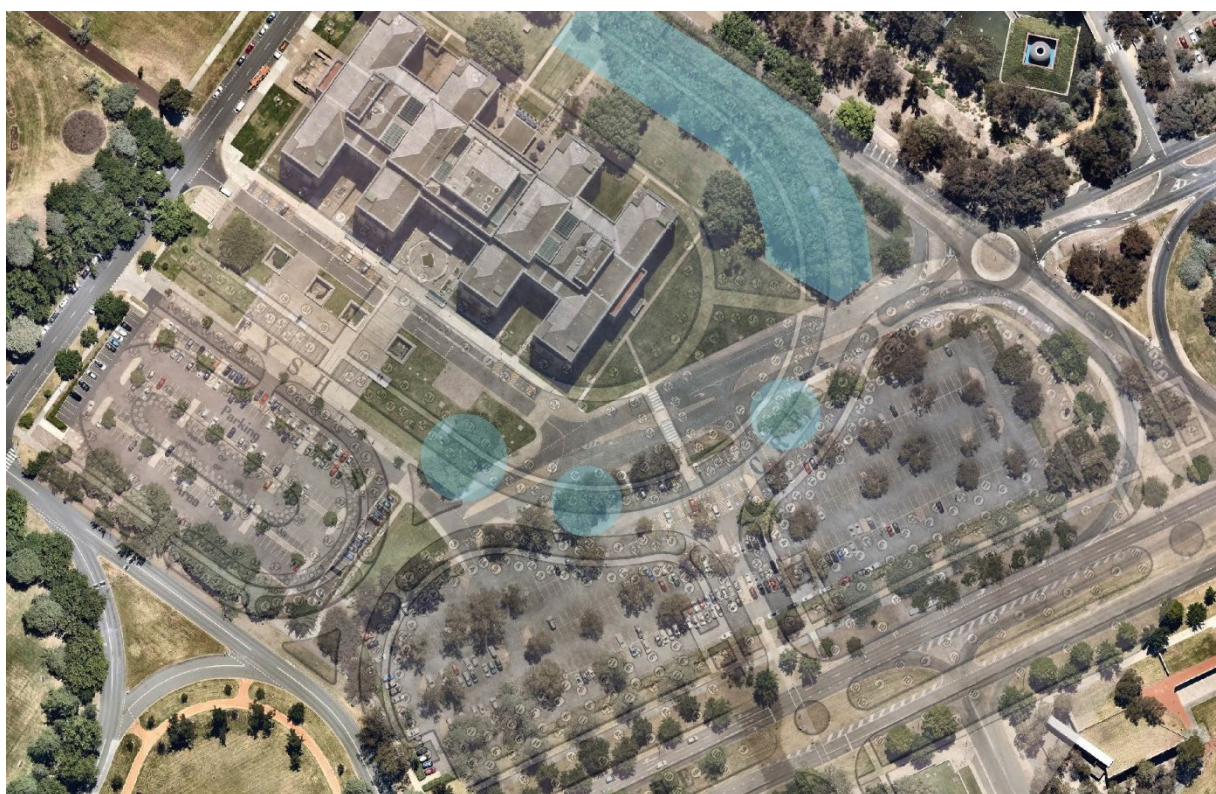


Figure 2.3 Detail of a 1928 plan showing the planting in the Parliamentary Zone, laid over a satellite image of the development area. The 1928 map marked the location of the trees with a number corresponding to the species. The existing trees that likely date from the 1920s are marked in blue and correspond to the circular planting pattern. (Source: National Library of Australia, Bib ID: 109644, Nearmap aerial and GML overlay)

2.3 Heritage Values

2.3.1 Listed Heritage Values

The development area is close to numerous places that have listed or identified heritage values. The Commonwealth-listed heritage values of the John Gorton Building and the

Parliament House Vista are outlined in the Table 2.2. The values and attributes of other relevant places are outlined in Appendix C.

Table 2.2 Summary of the Commonwealth Heritage values and attributes of the John Gorton Building and Parliament House Vista.

John Gorton Building	
Commonwealth Heritage Values	Key Attributes
<ul style="list-style-type: none"> • Significant as a good example of the inter-war Stripped Classical style. • Occupies a prominent and strategic location flanking the Land Axis within the Parliamentary Zone. • Contributes to the planned aesthetic qualities of the Parliamentary Zone as a designed, historic cultural landscape together with the Treasury Building balancing its mass across the central lawns of the Land Axis. 	<ul style="list-style-type: none"> • The inter-war Stripped Classical style expressed in the: <ul style="list-style-type: none"> – symmetrical façades; – division of exterior façade into vertical bays; – use of Classical details and basic Classical column form; – expressed portico, – simple surface treatments; and – subdued spandrels between the storeys which emphasise verticality. • Design elements that retain a high level of integrity including the exterior, foyers, lift lobbies and central corridors. • Prominent and strategic location within the Parliamentary Zone, particularly the relationship to the Land Axis and the Treasury Building.
Parliament House Vista	
Commonwealth Heritage Values	Key Attributes
<ul style="list-style-type: none"> • Strongly associated with the history of politics and government in Australia and the development of Canberra as the National Capital. Aesthetically significant due to the visual impact of the extensive open sweeping vista along the Land Axis that can be experienced in two directions, the designed Axes set within natural features of forested hills, patterns and textures of architectural massing accentuated by planned open spaces, 	<ul style="list-style-type: none"> • The concentration of buildings, parklands and gardens that support Commonwealth parliamentary and governmental activity, as well as to some extent the national cultural life. • The extensive vista along the Land Axis, the forested hills, patterns and textures of architectural massing accentuated by planned open spaces, water features and extensive tree plantings, artworks, the terminal features plus the interplay of scale and texture in the designed landscape, as

water planes and tree plantings that are arranged across the area.

- Significant for its visual drama with its ability to engage viewers in the visual perspective of the sweeping vista to the terminal features.
- Highly significant for its symbolic representation of the democratic interchange between the people and their elected representatives and its use of the natural landforms to generate a strong planning geometry.
- The core of the most ambitious and most successful example of twentieth century urban planning in Australia.
- Associated with the broader Australian community because of its social values as a symbol of Australia and the Federal Government.
- The Vista area has a strong association with numerous architects and planners, in particular Walter Burley Griffin, Marion Mahoney Griffin, John Smith Murdoch, Chief architect of the Commonwealth Government, and Thomas Charles Weston, Superintendent of Parks, Gardens and Afforestation in Canberra and notable planners of the National Capital Development Commission such as Sir John Overall, Peter Harrison and Paul Reid.

well as the large-scale qualities of the axes, including the open green spaces combined with patterns and **symmetrical characteristics of the road networks** and numerous designed smaller attributes, including **the street tree plantings.**

- The **whole vista**, including all elements and features contained within it, as well as the natural wooded hills beyond.
- Memorial features, including sculptures, plaques, commemorative trees, water features and gardens.
- Recreational landscape spaces and gathering spaces in which the community may demonstrate.
- The whole vista, its planned layout, and the view from the Mount Ainslie, which illustrates the realisation of Marion Mahony Griffin's perspective drawing.

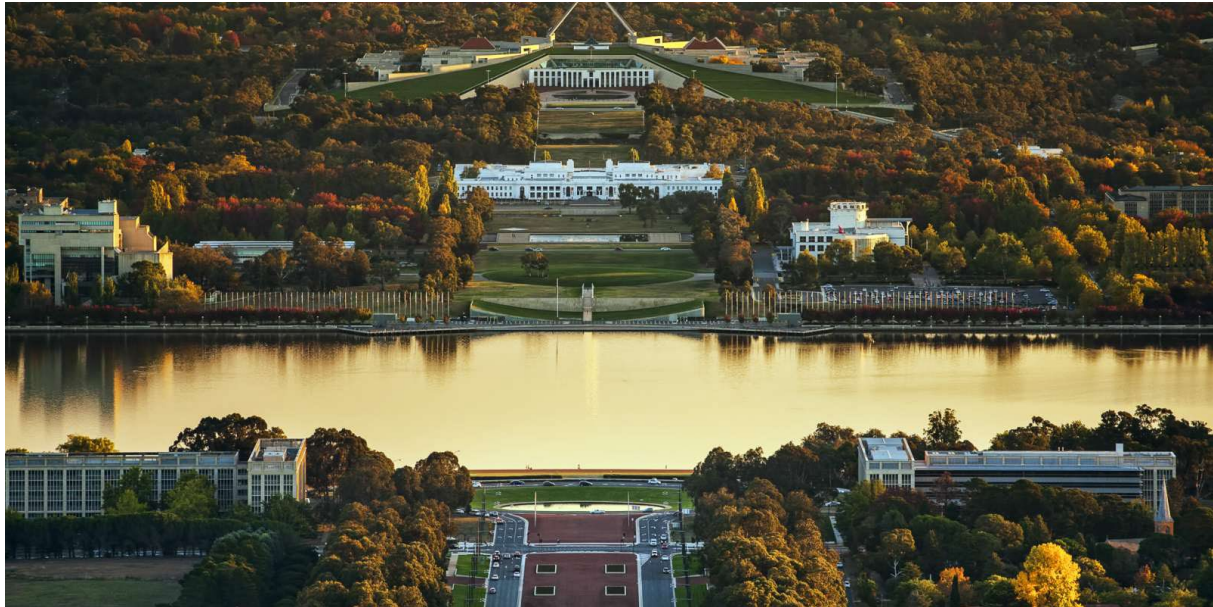


Figure 2.4 View of Parliament House Vista looking south, demonstrating the rectangular forms and horizontality in the landscape. (Source: Visit Canberra, 2021, <<https://visitcanberra.com.au/canberra-precincts/parliamentary-triangle>>)

2.3.2 Other Relevant Heritage Values

The National Triangle as a Designed Cultural Landscape

In addition to the listed and identified heritage places, the project area is within a highly integrated designed cultural landscape as part of the National Triangle and Parliamentary Zone. The significant heritage values of the Zone, as a place telling the story of Australian democracy, are closely interrelated and represented through the symbolism and function of the landscape. As identified in Section 1.4.1, all heritage values in the project area are protected under the EPBC Act because they occur on Commonwealth land or are subject to actions by Commonwealth agencies and must be considered.

The Commonwealth Heritage place 'Lake Burley Griffin and Adjacent Lands', listed in 2022, contributes to recognising the layers of the National Triangle landscape, though its heritage values are primarily associated with the lake itself and do not intersect with the project area. The project area does align with the designed cultural landscape that was identified in the Canberra: The Planned National Capital National Heritage List nomination, as well as with Kings Avenue and its surrounding environments. The National and Commonwealth Heritage List nominations for Canberra: The Planned National Capital and for Certain Lands on National Road usefully articulate heritage values in the landscape which, although not listed, must be considered.

The implementation of the Griffins' plan for Canberra as the national capital is represented by the historic character of the designed landscape in the Central National

Area—evident in the road layouts, trees, planting patterns, building placement. The historic layer of planning by the National Capital Development Commission (NCDC) is also represented in the landscape, although the NCDC period of development from the 1950s to the 1970s is less well documented than the earlier Griffin planning and Federal Capital Commission development phases.

The influence of the Griffin’s and Charles Weston on the Parliamentary Zone

The legacy of the Griffin’s Plan and subsequent designers creating a distinctive and nationally important landscape is seen in the combination of road geometry, parks and plantings, significant buildings and monuments and the intangible experience the Parliamentary Zone which come together to create a culturally significant landscape with highly integrated heritage values.

As the Griffins designed the city, others helped implement the plan. Charles Weston was appointed Director of City Planning and Superintendent of Parks and Gardens in 1921 and commenced planting the Parliamentary Zone to give form and structure to the Griffin Plan. Weston made decisions about the style, species and density of planting in the Parliamentary Zone and along the avenues. Kings Avenue (then called Federal Avenue) was planted in 1926 with cedars, elms and Bunya pines and followed very closely to Weston’s design for Commonwealth Avenue—a formal avenue effect which was suitable to Griffin’s proposed road geometry.

Within the Parliamentary Gardens (Parliamentary Zone), the location and design of plantings was influenced by John Murdoch, Chief Architect and implemented by Weston. The design created formally shaped grassed vistas and ‘outdoor rooms’. Establishing the Parliamentary Zone was recognised as a priority, a way to put into practice the lofty idea of a capital city built from nothing on the plains.

Weston’s planting on the Griffins’ design started to create a space of appropriate status and high-quality design. Within the Parliamentary Zone, Weston deliberately over-planted the site, having in mind the goal of creating a quick landscape effect, establishing wind breaks and possible species performance difficulties. Many of these trees remain in the Parliamentary Zone and National Triangle.

Refer to Appendix B for a historical analysis of the trees within the proposed development area.

Canberra: The Planned National Capital

In 2009 a nomination to the National Heritage List was received for ‘Canberra: the Planned National Capital’. The Australian Heritage Council assessed this nomination and found that the place had outstanding heritage values that met the threshold for National Heritage criteria (a), (e), (f), (g) and (h) under the EPBC Act.³ In May 2022 the Minister for the Environment decided not to include the nominated place on the National Heritage

List due to factors unrelated to whether it had heritage significance, including the outcome of discussions with the ACT Government. However, the nationally important heritage values identified by the Australian Heritage Council are still protected under the EPBC Act within the study area, as this area is Commonwealth land and consequently all heritage values within this environment are protected, whether listed or not.

The values identified in the assessment, which includes attributes relevant to this project, are summarised in Table 2.3.

Table 2.3 Summary of the identified heritage values and attributes of Canberra: the Planned National Capital

Canberra: The Planned National Capital	
Heritage Values (from the NHL Assessment)	Key Attributes (from the NHL Assessment)
<ul style="list-style-type: none"> • Canberra has outstanding heritage value to the nation because of the place’s importance in the history of Australia’s urban planning and Australia’s evolving democracy. • Canberra has outstanding values to the nation because of the place’s importance in exhibiting an ensemble of designed urban landscapes and settings that display and project its status, function and significance as the national capital. These features are valued highly by the Canberra and Australian communities for their aesthetic appeal. • Canberra demonstrates a high degree of creative and technical achievement in town planning, urban design and urban horticulture. Its ensemble of planned city features demonstrating successive twentieth century urban design and planning approaches adds up to a showcase of outstanding value to the nation. • Canberra the Planned National Capital has outstanding heritage values to the nation because of its special association with Australians as the nation’s capital and seat of the federal democracy. Canberra also has a special association for Indigenous 	<ul style="list-style-type: none"> • Views from Mount Ainslie, Black Mountain, Red Hill and Mt Pleasant along the Land and Water axes. • Views of national buildings in a parkland setting within the National Triangle, including those of the Parliament houses, the National Library, the High Court and the National Gallery of Australia. These buildings reflect the dignity and status of the national capital and act as visual pivots in the appreciation of the Parliamentary Zone. • Layout of central Canberra, drawn from the Griffins’ design, which includes grand axial vistas that align with the surrounding hills, the ornamental use of water, sweeping views towards distant mountain ranges and a mix of designed plantings and natural bush that together is appreciated as distinctively Australian. • The Griffins’ use of topography in the arrangement of the early city and its layout in accordance with its two principal axes—the Land and Water axes. • The high proportion of parkland in the national area.

Canberra: The Planned National Capital

- Australians as the place significant progress has been made towards Indigenous rights and reconciliation.

 - Canberra has outstanding heritage values to the nation because of the place’s special association with the lives and works of Prime Ministers and Governors-General of Australia as a group, and individual town planners Walter Burley Griffin and Marion Mahony Griffin.
- The symbolic placement of the National Triangle to signify ideas about Australia, including the **alignment** of the National Triangle to topography and natural landscape features to signify the importance of the Australian landscape in the Australian identity.
- The **symbolic placement** of buildings and parks within the National Triangle to **signify** the three arms of government and representative democracy.
- The use of **geometry** in the layout and organisation of the early city.
- The tree lined boulevards of King Edward and King George Terraces.
- The deliberate **location** of showcase buildings addressing the Land and Water axes.
- The use of **architecture** to create and reflect the **dignity, status and function** of the national capital within the National Triangle.
- The **location** of the Administration Building (John Gorton Building) and the Treasury Building addressing each other across an **open, flat, lawn**.

Kings Avenue

The ‘Certain Roads on National Land in Central Canberra Commonwealth Heritage Assessments’ report prepared for the National Capital Authority in 2014 considered the heritage significance of Kings Avenue and identified preliminary heritage values of significance.

These draft values have been excerpted in Table 2.4.

Table 2.4 Summary of relevant identified heritage values and attributes of Kings Avenue, from Certain Roads on National Land report.

Kings Avenue	
Heritage Values	Key Attributes

Kings Avenue

- Kings Avenue is significant as an integral and major part of Walter Burley Griffin's 1911 plan for the national capital, and its realisation is associated with the evolution of the cultural landscape of the nation's capital.
- Kings Avenue is one of the three major avenues defining the edges of the National Triangle and the initial design of the national capital is a highly significant part of Australia's and Canberra's history.
- Kings Avenue is significant being relatively rare as an original and major part of Griffin's design representing one side of his planned National Triangle.
- Kings Avenue helps to demonstrate the planning of a national capital which is an uncommon aspect of Australia's cultural history.
- The cultural landscape of the national capital, including Kings Avenue, is significant from a research perspective in providing, through an examination of records and landscape elements, information and an understanding of the capital's cultural landscape.
- Kings Avenue is significant as a good example of an important type of landscape—wide tree-lined avenues—which are an important feature in Canberra's planning and landscape.
- Kings Avenue is significant as a major part of a landscape/urban design that represents a paradigm shift in urban planning in Australia.
- Kings Avenue is an integral part of the designed national capital, acclaimed for its design excellence, which is of
 - Kings Avenue overall—**wide tree-lined avenue**.
 - **Formality** in the design and aesthetic of Kings Avenue.
 - The siting, alignment and width of Kings Avenue.
 - **Plantings**—layout and mix of native and exotic species.
 - Historical **function** as a major and active boulevard that facilitates public movement throughout Canberra.
 - Views north and south along Kings Avenue.
 - The **visual and spatial relationship** of Kings Avenue with Commonwealth and Constitution Avenues—the other two sides of the National Triangle.

Kings Avenue

importance in the history of Australia and its capital city.

- Kings Avenue has special associations with Walter Burley Griffin and Charles Weston, both persons of importance in Australia's cultural history.

2.3.3 Indigenous Heritage Values

Indigenous people have occupied Canberra and the surrounding region for more than 20,000 years, and the landscape of the central Canberra area and its natural and cultural environment continue to have cultural heritage significance to the Traditional Owners.

The following information has been sourced from publicly accessible databases and other widely published sources. It does not contain any culturally sensitive information and does not require redaction.

There are numerous areas of Indigenous heritage significance in the Canberra area, including modern-day Capital Hill (known to be a traditional campsite), Black Mountain and Mount Ainslie. The ACT Heritage Register includes two Aboriginal cultural sites within the Parliament House Vista: a campsite on the southern banks of the Molonglo (now inundated by Lake Burley Griffin) and artefacts discovered in the Old Parliament House Senate Gardens.

The area that is the subject of this proposal has been substantially modified and disturbed over time by extensive landscaping and roadworks in the Parliamentary Zone and the construction of the existing carpark. The Heritage Management Plan for the Parliament House Vista noted that 'the possibility of undisturbed Aboriginal archaeological sites being present within the Parliament House Vista study area is likely to be restricted to the less developed portions of the [Vista] on the northern shores of the lake and in the now submerged slope terminations and terraces above the original course of the Molonglo River'.⁴ However, any potential for subsurface deposits of Aboriginal cultural material should be taken into account as part of the implementation of the project. Any further assessment of the Indigenous heritage values of the area and consultation with Canberra's Indigenous community is outside the scope of this report.

2.3.4 Summary of Relevant Heritage Values

The key heritage values relevant to the proposed action, and project area are:

- the significance of the John Gorton Building as an example of the inter-war Stripped Classical style (typical of Government buildings in the 1930s);

- its importance as a planned cultural landscape, with the use of architecture and open spaces to create and reflect the dignity, status and function of the national capital within the National Triangle. Elements of this importance include:
 - the size, design and materiality of key buildings and their location both in the landscape and in relation to other buildings, creating a landscape of building masses within planned open parkland space;
 - the primacy of buildings that are symbolic of Australian politics and government within the landscape, serving to symbolically represent Australian democracy and demonstrate the legislative, executive and judicial arms of government;
- the geometry of the layout of the Parliamentary Zone, including the use of Kings Avenue to help shape the significant planned and balanced landscape;
- the Charles Weston trees that demonstrate the horticulturalist’s implementation of the Griffins’ plan for the Parliamentary Zone; and
- key views and vistas that shape and draw focus to important landscape features, such as the Parliamentary Vista, the land axes and views north and south along Kings Avenue.

2.4 Heritage Management Plan Guidance

The various HMPs for the heritage places in the National Triangle and vicinity of the proposed action, identify heritage management guidance for the conservation of the fabric and setting. This section summarises the heritage guidance for the John Gorton Building and the Parliament House Vista. Other relevant places are outlined in Appendix C.

The information is summarised from the CHL or NHL citations or nominations and relevant policies in the relevant Heritage Management Plans.

Table 2.5 Heritage Management Policies for the John Gorton Building. (Source: John Gorton Building and Communications Centre HMP 2014–2015)

John Gorton Building Management Policies

Policy 7: Activities within and adjacent to the John Gorton Building should be low impact on fabric with heritage significance.

Explanatory text states that ‘activities should not damage original and early fabric, with inappropriate activities including excavation works in close proximity to the building and development works adjacent which would cause vibration to the building.’⁵

Policy 8: Future planning adjacent to the John Gorton Building should maintain significant views and vistas such as shown at Figure 2.5.

John Gorton Building Management Policies

- The John Gorton Building is significant for its landmark attributes and its association with the Parliamentary Zone. Current views and vistas to the building from the Treasury Building to the west and King Edward Terrace to the north along Edward Street should be retained.



Figure 2.5 Significant views and vistas (red arrows) from John Gorton Building to the northeast and northwest, as stated in the HMP. (Source: John Gorton Building and Communications Centre HMP 2014–2015)

Policy 9: Development adjacent to the John Gorton Building is not recommended. However, if there is no prudent or feasible alternative, new development should be considered within the development context of the significant area of the Parliamentary Zone.

- Explanatory notes state that ‘there is little potential for future development within the grounds of the JGB and the Communications Centre’ and that any proposed development works adjacent to the JGB elements ‘would require careful consideration within the context of the heritage values of these elements and further the development appropriateness within the significant area of the Parliamentary Zone, for example, location, symmetry, scale and materials’ (refer to p.100 of the 2014–2015 HMP)

Policy 35: Activities adjacent to the NCA managed elements [the grounds of the John Gorton Building] should be low impact.

Policy 36: Development adjacent to NCA managed elements of the John Gorton Building is not recommended, however if there is no prudent or feasible alternative, new development should be considered by the NCA and the Department of Finance within the development context of the heritage values of the elements and the significance area of the Parliamentary Zone.

Table 2.6 Heritage Management Policies for Parliament House Vista (Source: PHV Area HMP 2010)

Parliament House Vista Management Policies

The Parliament House Vista Area HMP 2010 provides the specific management policies, summarised, and included here as relevant to the project:

Policy 16: General conservation provisions for the landscape.

The overall Parliament House Vista development area landscape character will be conserved as parkland with a balance of formal and informal elements. In particular:

- conserve the underlying geometry of the area, including the major boundaries of Kings and Commonwealth Avenues, and Parkes Way, as well as the Land and Water Axes, and cross axes in the Parliamentary Zone, reinforced by the lake, buildings, plantings, parklands, gardens and road system;
- conserve the treescape, including the avenues of trees;
- conserve the creation of recognisable character in specific areas, achieved through the careful selection of trees, shrubs and other materials;
- conserve the replacement of strict symmetry with a balanced development in the National Triangle, reinforced by the lake, buildings, plantings, parklands, gardens and road system, and conserve the stricter symmetry in the Land Axis corridor.

Policy 18: Tree maintenance and replacement

- The NCA will seek to conserve the treescape of the area and trees replaced as necessary. The design concept relevant to existing plantings will be maintained;
- The contrast in form and foliage, flowers and fruits provided by the mix of evergreen and deciduous species will be maintained.
- Trees within the area will be maintained, including periodic tree surgery as necessary.
- In the case of dead, dying or dangerous trees, those in poor health unlikely to recover, or those displaying such poor characteristics as to substantially detract from the landscape, such trees will be removed. Generally trees will be replaced with the same species, especially in the case of significant trees (eg. commemorative trees). In the case of trees which are part of group, every effort will be made to use an advanced specimen.
- In the case of replacement trees for significant trees, the NCA will consider:
 - consulting possible stakeholders before removal of the existing tree; and
 - the possibility of undertaking some ceremony associated with the replacement planting, depending on stakeholder views.
- Given that the initial spacing of some group plantings may have been too close to allow trees to develop fully, therefore selective removals could take place to allow remaining trees to develop fully. It will be recognized however, that this may not be possible with closely spaced conifers

Policy 28: Major buildings

Key qualities of the John Gorton Building to be conserved include:

Parliament House Vista Management Policies

- its siting;
- its external form; and
- use for government accommodation.

Policy 34: Roads

Generally, maintain existing roads unless otherwise noted. Changes may be undertaken, however, any adverse impact on heritage values will in all case be no greater than any existing impact. The heritage values of road alignments which match the Griffin, Holford and National Capital Development Commission (NCDC) designs will be carefully considered in any proposal to change such roads.

Policy 35: Car and bus parking

Existing car and bus parking may be maintained, or removed, if possible. Parking will generally be screened from view, especially in the case of major vistas, and otherwise located outside of major vistas.

Policy 42: Protection of Setting

- The NCA will protect the setting of the Parliament House Vista to the extent possible within its powers. Beyond this, the NCA will encourage such protection for those areas which fall outside its responsibilities.

Policy 43: Protection of views to and from the area

The significant views to and from the vista will be protected. The significant views include:

- to the current Parliament House;
- from Commonwealth and Kings Avenues, especially the bridges.

Commentary from the HMP: This policy deals with external relationships and not specifically with views inside the area.

Policy 49: General provisions relating to new development:

- new permanent developments will not impact on the heritage values of the area not on important spatial relationships between individual buildings and open spaces (eg the relationship between the High Court and the National Gallery, or between the Gallery and Sculpture Garden);
- new permanent development in the area will be part of a planned approach which is in keeping with the values of the area. Ad hoc development will be avoided;
- developments will generally maintain public access to parklands and open spaces, and will not close off spaces;
- new structures will not exceed the mature tree canopy in the vicinity or, in the case of the Parliamentary Zone, the RL of the height of the National Library, whichever is higher;
- permanent structural or building intrusions to the Land Axis, Water Axis and the cross axes in the Parliamentary Zone (National Library—National Gallery of Australia and Treasury Building—John Gorton Building) will not be permitted;

Parliament House Vista Management Policies

- permanent intrusions which block or substantially intrude into significance views/vistas will not be permitted—proposals should carefully consider any visual impact; and
- consideration will be given to the impacts of new development on the values attributed to the development area and its components by specific and broader associated communities, as well as the impacts on existing institutions, government agencies, groups associated with specific sites (eg memorials), lessees and businesses, and other users and visitors to the development area. This will include consideration of construction-phase impacts.

Policy 50: New landscaping, landscape structures and plantings

- New landscaping, landscape structures and plantings, not including replacement plantings, may be permitted subject to the following:
 - that it is consistent with the general landscape conservation provisions and provisions relating to specific components (see Policies 16 and 17);
 - that it respects the existing tree planting patterns within the area; and
 - that it is consistent with any management plan for the specific component affected.

Policy 51: New major buildings

New major buildings may be permitted subject to the following:

- the provisions of the National Capital Plan including Appendix H regarding design and siting, and the master plan at Appendix T6 for the Parliamentary Zone;
- a comprehensive planned approach to the provision of major buildings within the area will be undertaken;
- building designs will be of high quality, either consistent for the overall area or consistent within major precincts, or designed in sympathy with other buildings in the immediate setting;
- with regard to design qualities:
- the style of buildings will pay due regard to adjacent buildings and the overall balanced development objective for the Parliament House Vista;
- maximum building heights will generally relate to the mature tree canopy of the area;
- predominant building materials and colours will generally draw on the palette of existing materials and colours used; and
- buildings should be predominantly oriented to the Land and Water Axes. That is, components of the building may depart from this orientation but the overall effect should match the axes.

Policy 54: New parking

New parking within the Parliament House Vista may be permitted provided that:

- generally, basement parking is to be provided in new buildings;
- it is otherwise underground;

Parliament House Vista Management Policies

- minor new surface parking may be provided as part of new building development; and
- there is no nett encroachment into parkland areas in the case of new surface parking areas to replace existing areas, and new surface carparks will be screened.

2.5 Endnotes

- ¹ Gray, J 1999, 'T.C.G. Weston (1866-1935), Horticulturist and Arboriculturist', Doctor of Environmental Design Thesis, University of Canberra, p 1.
- ² Duncan Marshall et al 2013, Parkes Place and the National Rose Gardens Heritage Management Plan, prepared for the National Capital Authority, p 69.
- ³ Minister for the Environment, 8 April 2022 'Statement of Reasons: Decision under section 324JJ Environment Protection and Biodiversity Conservation Act 1999: Canberra the Planned National Capital', accessed 17 May 2022 at <http://www.environment.gov.au/heritage/laws/publicdocuments/pubs/106074_decision_statement_20220408.pdf>
- ⁴ Duncan Marshall et al 2010, Parliament House Vista Area Heritage Management Plan, prepared for the National Capital Authority, p 26.
- ⁵ ERM 2014, John Gorton Building Heritage Management Plan, prepared for the Department of Finance and Deregulation, p 100.

3 Proposed Action

3.1 The Proposal

The proposed action is described in the *John Gorton Campus Carpark Design Report* prepared by BVN (16 December 2021) and updated in the August and September 2022 design package with additions from Oxigen and GHD.

Based on the design as presented in the documentation, the proposed action is for the construction of a five-storey building with approximately 1153 carparking spaces, to be located to the east of the John Gorton Building. The building would have two lift/stairwells coming out of the façade on its eastern and western sides. A childcare centre would be included at the north-eastern end of the building, facing King Edward Terrace. The height of the carpark building would be below the maximum height of the John Gorton Building.

After consideration of several design iterations, the proposed carpark has been designed in a rectangular form, reflecting the architectural language of the Parliamentary Zone and maximising efficient use of space (Figure 3.1). The façade treatment and materials palette is proposed to be a mix of pre-cast concrete, reflecting the monumentality of the Parliamentary Zone buildings, and COR-TEN steel leaves, reflecting the colour of the native Australian banksia plant and the iron oxide of the Australian continent.

The project would require the creation of a new intersection on Kings Avenue opposite Blackall Street to provide entry and exit access (Figure 3.2).



Figure 3.1 Render of the building design—northern frontage, with the John Gorton Building to the right. (Source: BVN Design Report, December 2021, p 4.)

The Design Report states that the new carpark would need to accommodate or offset the carparking spaces currently in a Barton carpark that are proposed to be replaced with the development of a new Commonwealth Office building on the site (the proposed Commonwealth Office Precinct). The existing John Gorton Building surface carpark would also need to be accommodated in the proposed new carpark development.

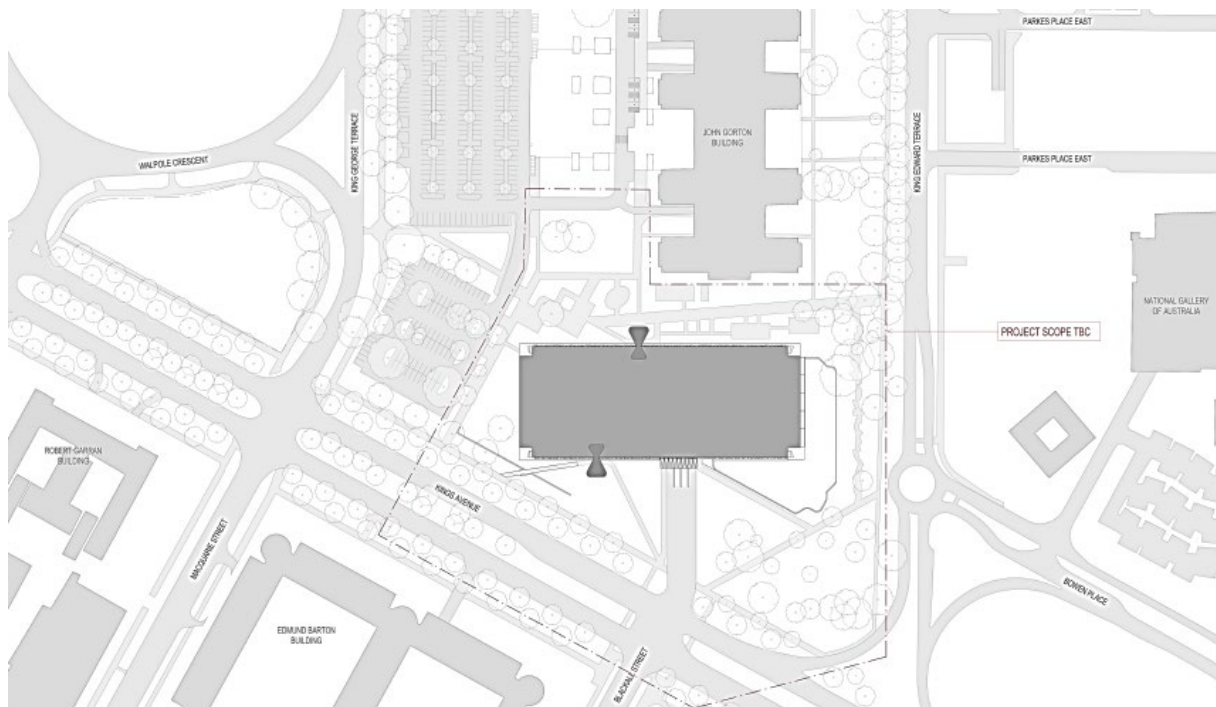


Figure 3.2 Proposed site of the carpark, located to the east of the John Gorton Building. This drawing also shows the proposed intersection at Kings Avenue and Blackall Street. (Source: BVN September 2022).



Figure 3.3 Architectural render of the proposed building, adjacent to the John Gorton Building (east and parallel with Kings Avenue). (Source: BVN, Design Report December 2021, p 22)

3.1.1 Proposed Scale and Function

Scale

The proposed building would be 17.4 metres tall, below the maximum height of the John Gorton Building at 27 metres—this includes stairwells and plant services (Figure 3.4). The top of the carpark would sit slightly below the fifth-floor parapet of JGB, this being the main visual reference for the height and mass of JGB from ground level, as the sixth floor and plant room are set back towards the centre of the building.

The width and length of the building are indicated in Figure 3.5.

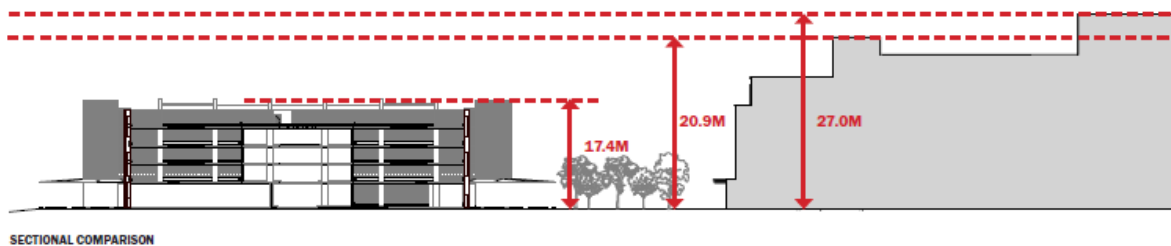


Figure 3.4 Cross-section drawing showing the height of the proposed carpark (left) against the John Gorton Building (right). (Source: BVN, Design Report December 2021 p 12).

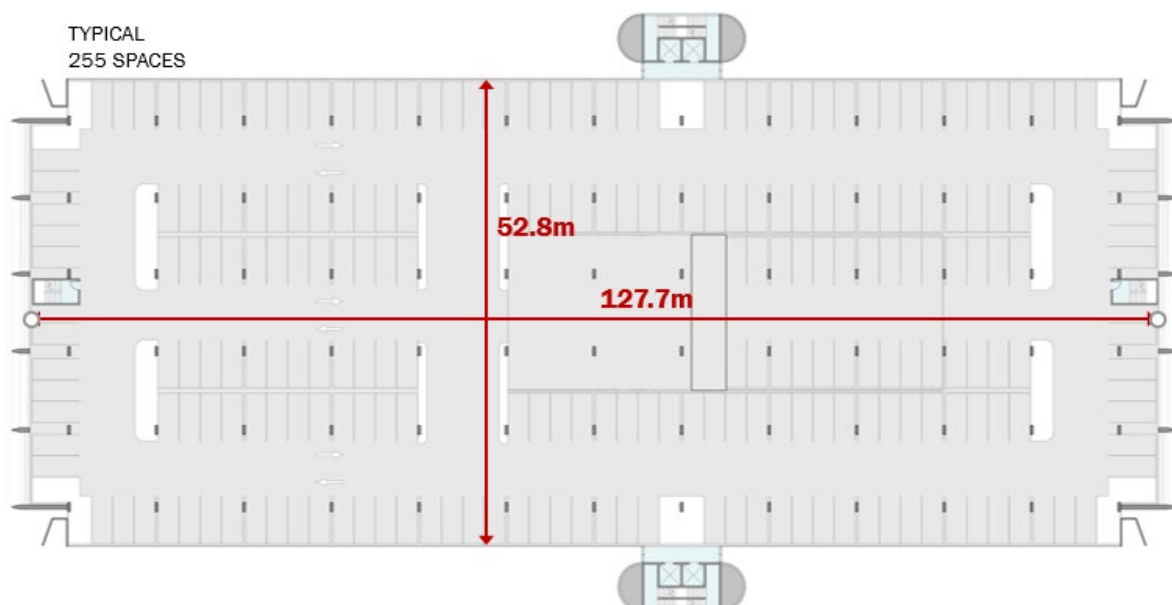


Figure 3.5 Drawing of the proposed carpark from above, showing width and depth, note that the stairwells are now proposed to be set further away from the building. (Source: BVN, Presentation to DAWE 15 November 2021).



Figure 3.6 Render providing the indicative scale of the proposed building from ground level, looking west from Kings Avenue.



Figure 3.7 Photo montage view of the proposed building from King Edward Terrace. (Source: BVN October 2022)

Function

In addition to its main function as a carpark, the proposed building would include a childcare centre. This is reflected in the larger height of the ground floor, which would also allow for future retail use of that level. The childcare centre would be located on the ground floor at the northern end of the building, to maximise sunlight to an external play

area to the northeast of the building (Figure 3.8). Carparking for the childcare centre is provided for on the same level.

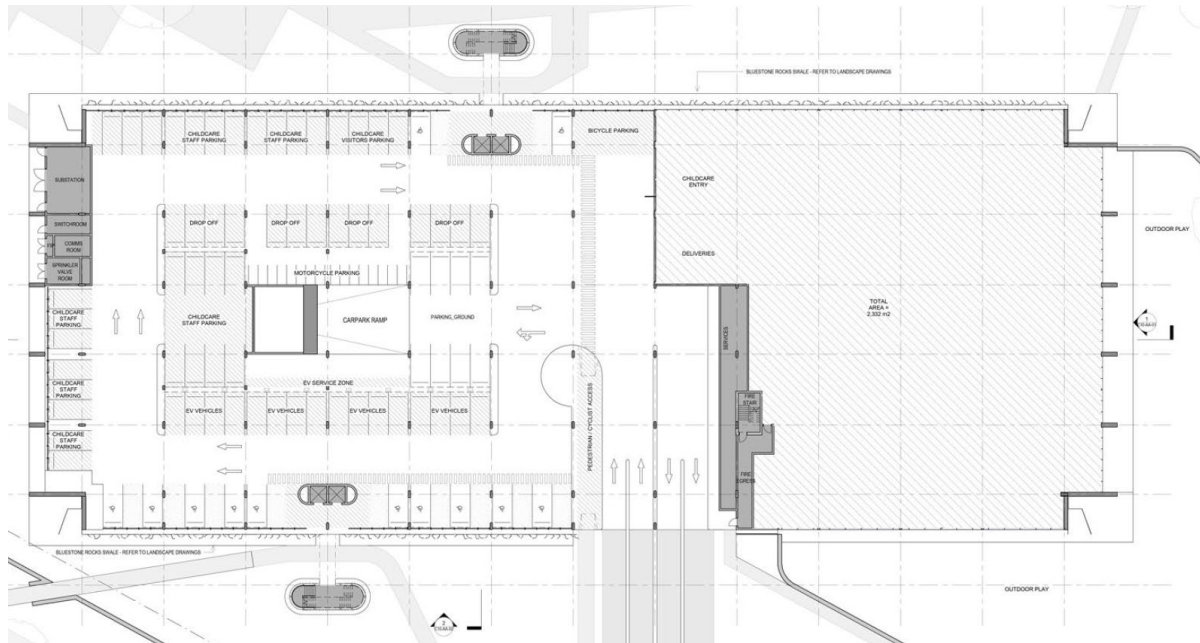


Figure 3.8 The ground floor of the carpark, showing the location of the childcare centre on the northern end, the carpark entrance is to the south. (Source: BVN, September 2022)

3.1.2 Proposed Materials and Design

The building is proposed to be constructed of a concrete frame with a material palette of polished and exposed coloured aggregate precast concrete panels and variegated weathering steel (COR-TEN) leaves.

To meet environmental controls, the carpark would rely on natural rather than mechanical ventilation to circulate air. To enable this, 50% of the façade treatment would need to be open. However, the NCA requires that cars parked in the building should not be visible from outside. To comply with these environmental and visual requirements, the project team propose to fix to the COR-TEN panels to the buildings' structure in a pattern derived from a computational method and reflective of the banksia plant. They consider that this pattern would allow suitable ventilation while obscuring views of the cars. The relatively lightweight façade would also diminish the weight of the structure and require negligible ongoing maintenance.¹

The rectangular design of the building and the use of horizontal and vertical panels are intended to create a structure that reflects the design language of other buildings in the Parliamentary Zone, with a pronounced profile and monumental character (Figure 3.9). The northern and southern façades of the building have concrete elements derived from

other buildings in the Parliamentary Zone, such as the National Portrait Gallery, National Library and the John Gorton Building.

The eastern and western façades are a more atypical design for the Parliamentary Zone; the use of steel cladding in this layout references the colour palette of the banksia, and reflects an expression of Australia’s natural environment (Figure 3.10).

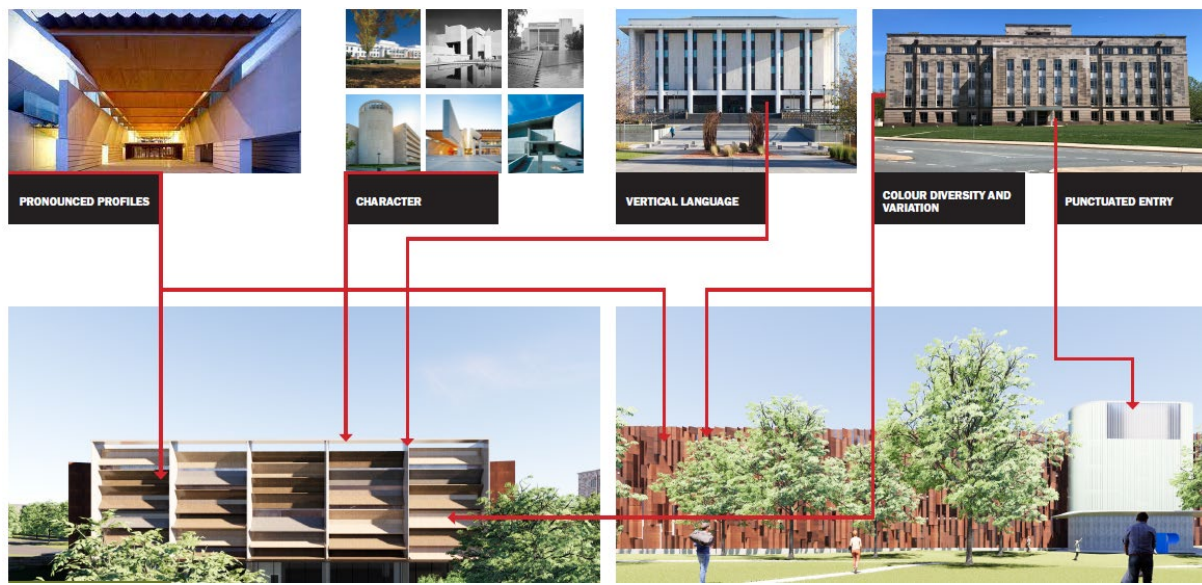


Figure 3.9 Design narrative of the proposed building structure and materials, demonstrating references to the surrounding Parliamentary Zone context. (Source: BVN, Design Report, December 2021, p 15).



Figure 3.10 Extracts from Design Report showing patterns of the proposed materials and design narrative references. (Source: BVN Design Report, December 2021).

3.1.3 Proposed Siting

The building is proposed to be located approximately 30 metres east of the John Gorton Building. The Design Report states that the proposed location combined with JGB frames

a new public place, giving JGB 'a formal address, enabling a lively and sun filled public square [and] demonstrating the siting of the heritage listed communication centre below'.²

Design development documentation identifies that:

By siting the building on the corner of the triangular site to the east of JGB the built corner of the campus becomes pronounced. It creates an address to King Edward Terrace and relates to the urban pattern of buildings with their address on the terrace. The siting of the building in this eastern site will enable a building of comparable use to JGB the opportunity to create a more considered public realm and create a campus character more convincingly than other site options of creating a public realm around a carparking building.

Further, it relates to the aspiration stated in the NCP namely that the existing buildings should determine the character of each campus and it can be inferred that a car parking building is a support function and should not be located in the prime development site—in this case other site options.³

The selected location allows the carpark to be sited away from Kings Avenue and align with the King Edward Terrace face of JGB (Figure 3.11).

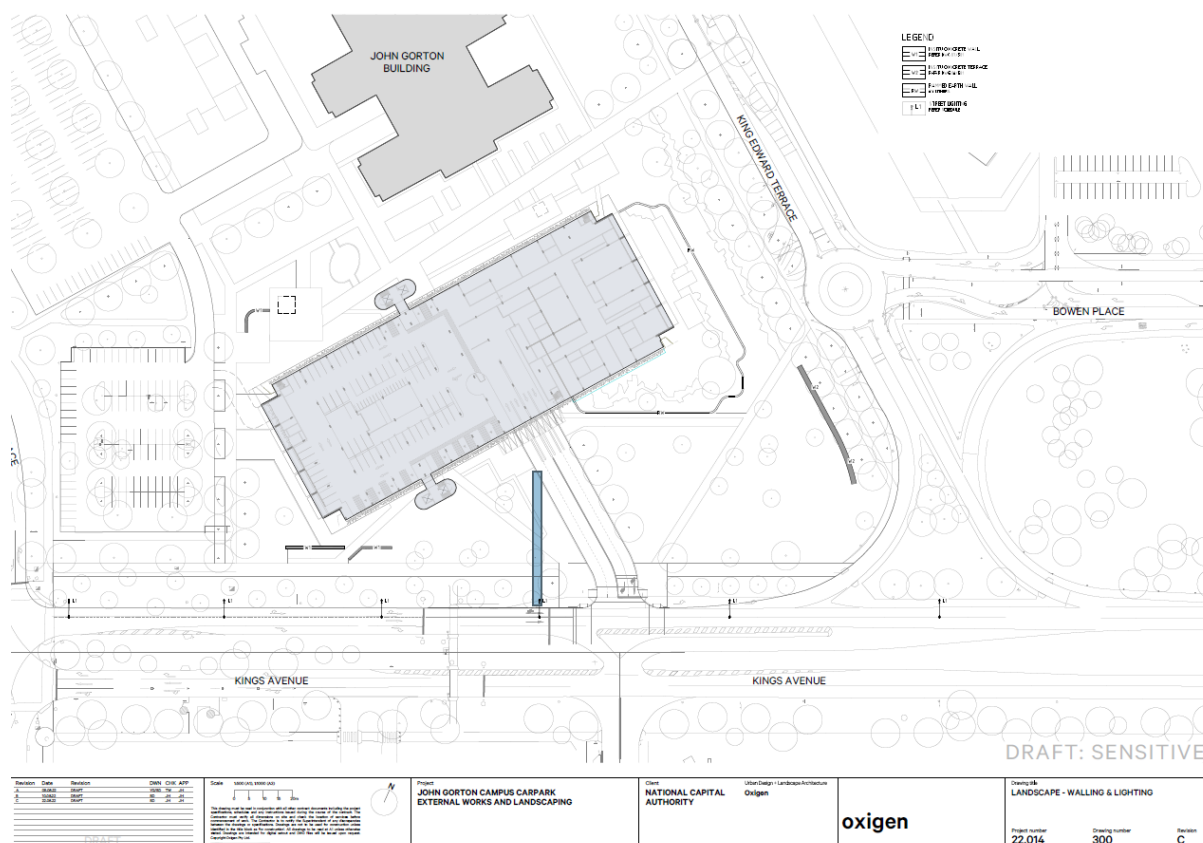


Figure 3.11 Drawing showing the siting of the proposed building. The 20m scale on the drawing shows that the proposed new building is approximately 30 meters from the edge of the John Gorton Building (Source: BVN, Presentation to DAWE October 2021).



Figure 3.12 Photo montage view of the proposed building from Parkes Place East. (Source: BVN October 2022)

3.1.4 Proposed Access

Vehicle access to the building is proposed to be facilitated by the creation of a signaled four-way intersection at Kings Avenue and Blackall Street. This would create an entry/exit road to the carpark from Kings Avenue (see Figure 3.11). This new road and intersection would involve altering the western verge of Kings Avenue by tapering and reducing the landscaped verge for the bus stop and vehicle lands, and the removal of the existing pedestrian crossing. The Kings Avenue median strip would be reduced by approx. 15cm on either side to widen carriageway.

The location of this intersection is slightly north of the position of a historical intersection constructed under the Griffin Plan, which was positioned in line with the current pedestrian crossing across Kings Ave in front of the Edmund Barton Building and pathway through the existing carpark (Figure 3.13).

These works would provide an opportunity to reinstate the original Charles Weston planting plan for Kings Avenue, however this is out of the scope of this project and not proposed at this time.

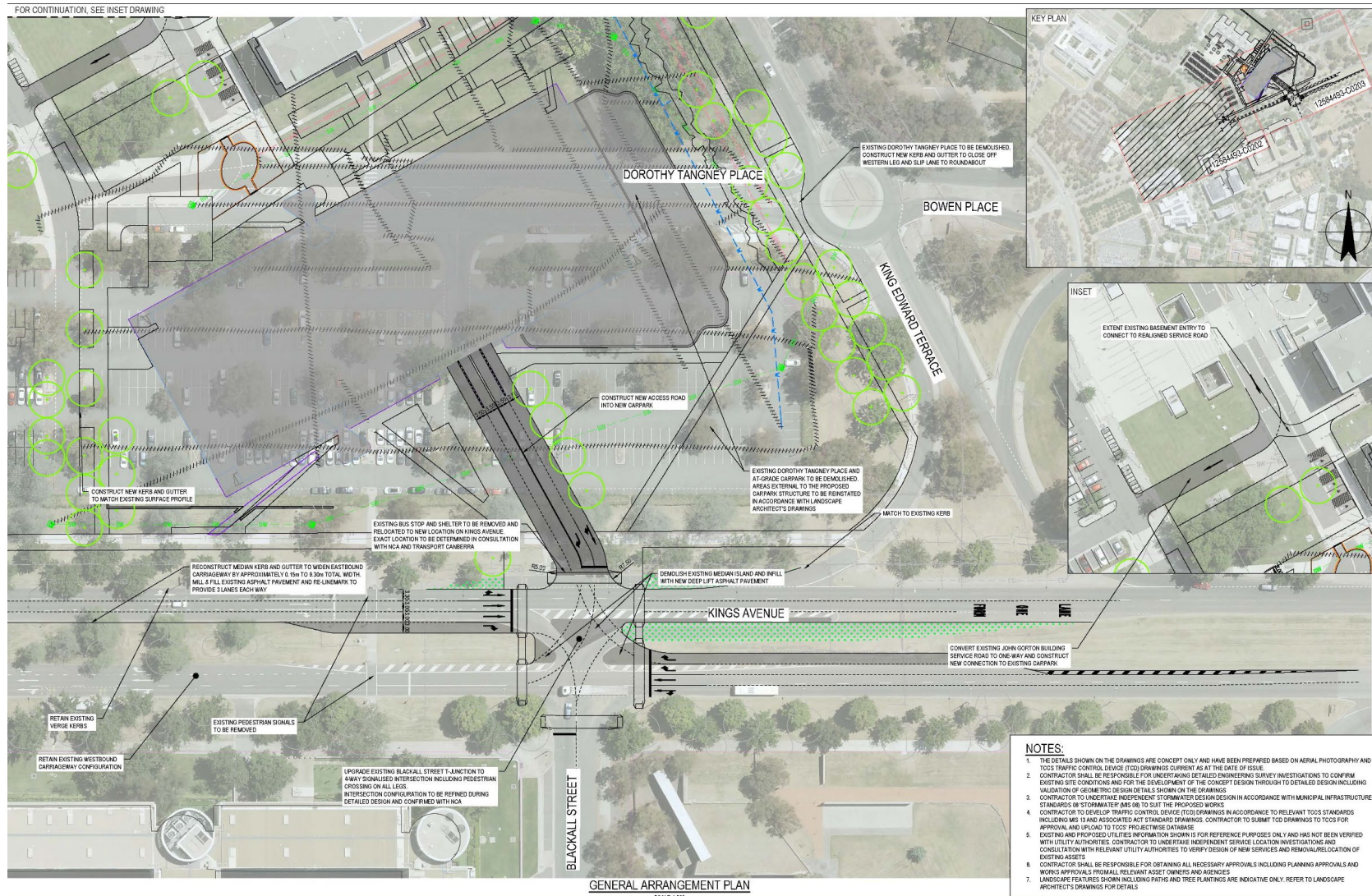


Figure 3.13 Proposed new intersection at Kings Avenue and Blackall Street. (Source: GHD, October 2022)

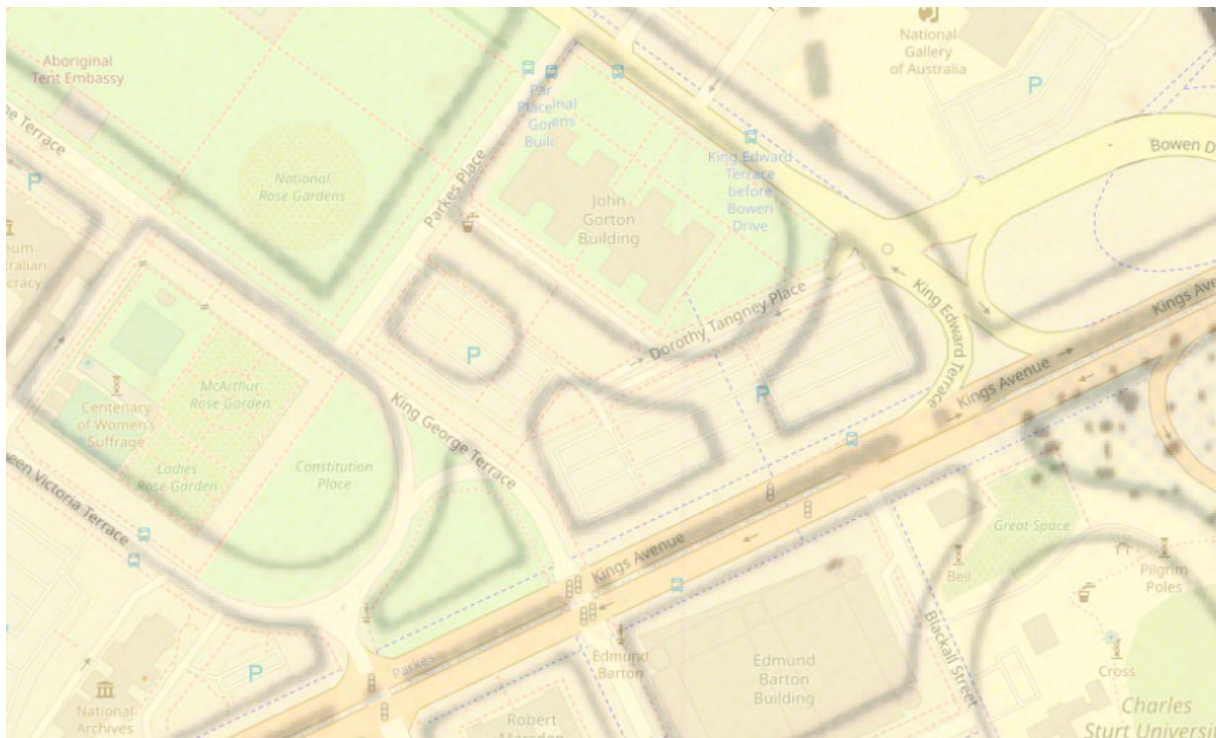


Figure 3.14 Current road alignment of the project area, with an overlay of the 1959 road alignment (dashed lines). The position of the original Kings Avenue intersection and its alignment with the current pedestrian crossing is evident at the centre of the image. (Source: NLA Bib ID: 313805).

3.1.5 Proposed Landscaping and Tree Removal

The landscape proposal, designed by Oxigen (August and October 2022) includes hard and soft landscaping elements. Large areas of irrigated lawn are proposed to the south, southwest and west of the carpark. The north and northwest areas would have paths of concrete, bluestone paving and decomposed crushed granite intersecting the areas of planting. The paths are location to pre-empt 'desire lines' and create connections to the National Gallery of Australia and surrounding office buildings.

Oxigen Landscape Architect's have provided the following information regarding the proposal.

The proposed landscape plan has a primary intent of:

- Assisting in achieving a satisfactory visual relationship between the proposed new built form and the building's context within the Parliamentary Zone.
- Replacing trees that are required for removal with species consistent with the existing historically significant trees within the Parliamentary Zone.

- Reinstating the landscape qualities of the John Gorton Building within its landscape and urban design context through replacement of surface bitumen carparking and roads with landscape.¹

The landscape plan has been informed and will be guided by the NCA Tree Management Policy and informed by historical evidence of the Griffin Plan and Thomas Weston’s plantings. In particular, the proposed landscape plan:

- Provides for more satisfactory views from Kings Avenue to the John Gorton precinct across a foreground of lawns and appropriate trees that replace the existing bitumen surfaced carpark and more recently planted eucalypts internal to the carpark.
- Maintains and strengthens the existing dense, mature tree plantings along King Edward Terrace.²

Around 45 trees are proposed to be removed to make way for the carpark and childcare building, access roads and the proposed landscaping. An arboricultural health assessment was carried out on the trees and the results presented in the landscape documentation (Oxigen Landscape Architects, August 2022). The document shows that most of the 60 trees proposed for removal were assessed as being in ‘fair’ health, 10 trees in ‘good’ health and just 4 as in ‘poor’ or ‘fair poor’.

As discussed in Appendix B, in 1928 a tree plan was prepared showing the locations of all trees that had been planted within the Parliamentary Zone up until that time. The plan shows that fifty different species (generally evergreen coniferous and deciduous species) were planted, marking out paths and roadways to create suitable seasonal microclimatic ‘outdoor rooms’. This was Charles Weston’s implementation of the Griffin’s plan of Canberra.

Numerous trees shown on the oblong shown on the 1928 plan (Figure 2.3) remain on site including Plane trees (*Platanus orientalis*), Californian Incense cedars (*Calocedrus decurrens*) and Pin oaks (*Quercus palustris*). It is likely that the large Atlas Cedar (*Cedrus atlantica*) trees to the north of the Kings Avenue footpath date from soon after the 1928 plan was prepared, but are not shown on the 1928 plan.



Figure 3.15 View looking east towards the development area. The three trees, historically significant plantings, in the mid-ground of the photograph are remnants from the Weston oblong shaped planting scheme (a Californian Incense cedar, plane tree and Pin oak).



Figure 3.16 View of historically significant trees along Dorothy Tangney Place. A Californian Incense cedar and plane tree are visible here from the Weston planting scheme.



Figure 3.17 View north along Dorothy Tangney Place towards another Californian Incense cedar, plane tree and Pin oak, remaining from the scheme.



Figure 3.18 View towards the lawns of the John Gorton Building and King Edward Terrace. The curve in the planting scheme can be seen at these rows of trees. Three Californian Incense cedars, and a number of plane tree and Pin oaks, remaining.



Figure 3.19 The curve of the historically significant Weston planting scheme, in the oblong shape—the Californian Incense cedar (far right), the Pin oak (second from right) and plane tree (third from right).

Figure 3.19 shows the trees proposed for demolition (in red text). This design documentation prepared by Oxigen (October 2022) is a revised approach to the landscape design for the development area. The revised design reduces the number of Weston-era trees proposed for removal. The earlier design (August 2022) proposed the removal of additional Weston-era (approx. 95 year old trees) from the oblong planting pattern reflecting the Griffin Plan, and would have severely impacted original fabric (the trees) and visibility of the curve around the John Gorton Building, and the ability to restore the oblong pattern in the future.

The revised landscape plan indicates that 10 more trees than earlier proposal, including five Weston-era trees from the oblong planting scheme, would be retained.

The revised landscape design would still result in the loss of four Weston-era trees along Dorothy Tangney Place, yet the curve to the east of the John Gorton Building would be retained (Figure 3.18). It is however, still unlikely that the planting scheme, (connected to the Griffin Plan) as a whole, could be reconstructed in future, as incremental changes to this area of the Parliamentary Zone has removed the opportunity.

The landscape design indicates that replacement trees, would include new deciduous and native trees, rather than the tree species of the Griffin Plan and Weston era planting in the Parliamentary Zone. These new trees are proposed to be planted mainly along King

Edward Terrace and around the on-grade carpark to the west of the proposed multistorey carpark building.

It is understood that Oxigen will interpret the historical planting schemes, which hold significant heritage values (ie the Griffin Plan and Western-era historical layout of the oblong shape) in the detailed design documentation for the current JGB carpark development.



Figure 3.20 Plan showing around 45 trees proposed for removal (red circles). Charles Weston plantings that are proposed for demolition are marked in yellow *Platanus orientalis*, green *Calocedrus decurrens* and blue *Quercus palustris*. At the Kings Avenue the slightly later (*Cedrus atlantica*) is marked in purple. (Source: Oxigen, October 2022, with GML overlay)

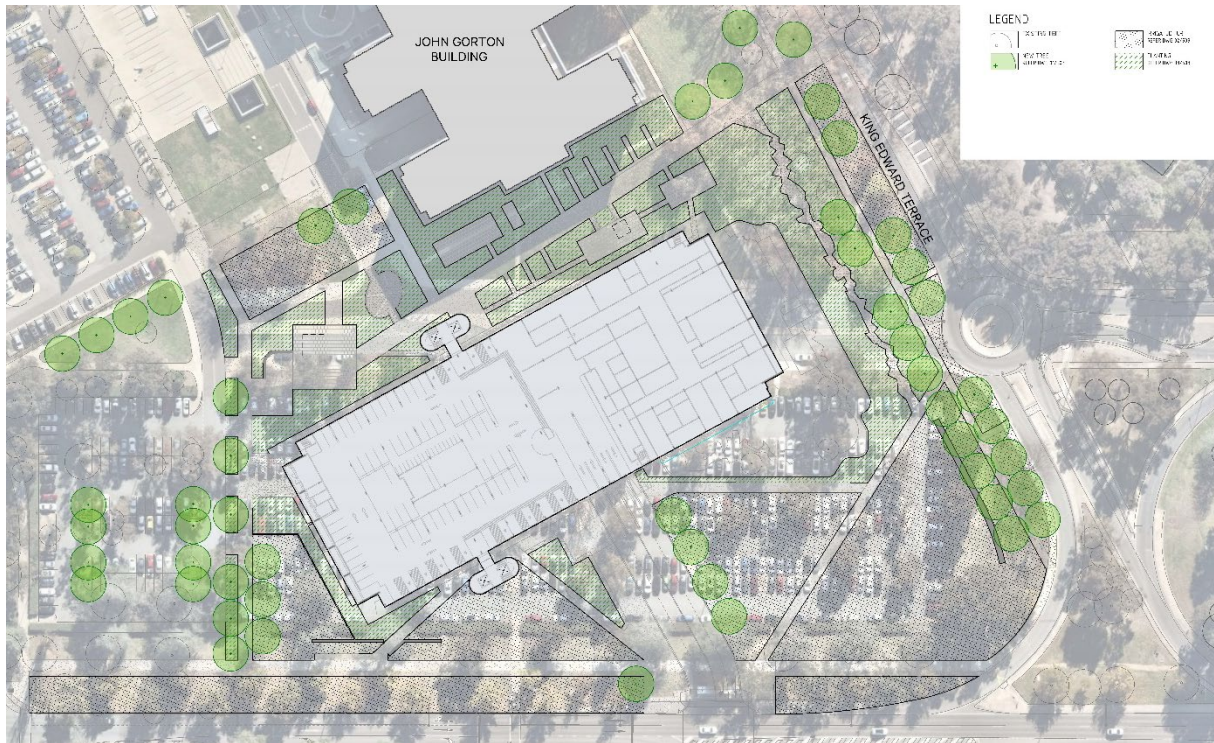


Figure 3.21 Proposed landscape plan, with new trees – green circles. Irrigated lawn is shown as grey hatching at the bottom of the drawing. (Source: Oxigen, August 2022)

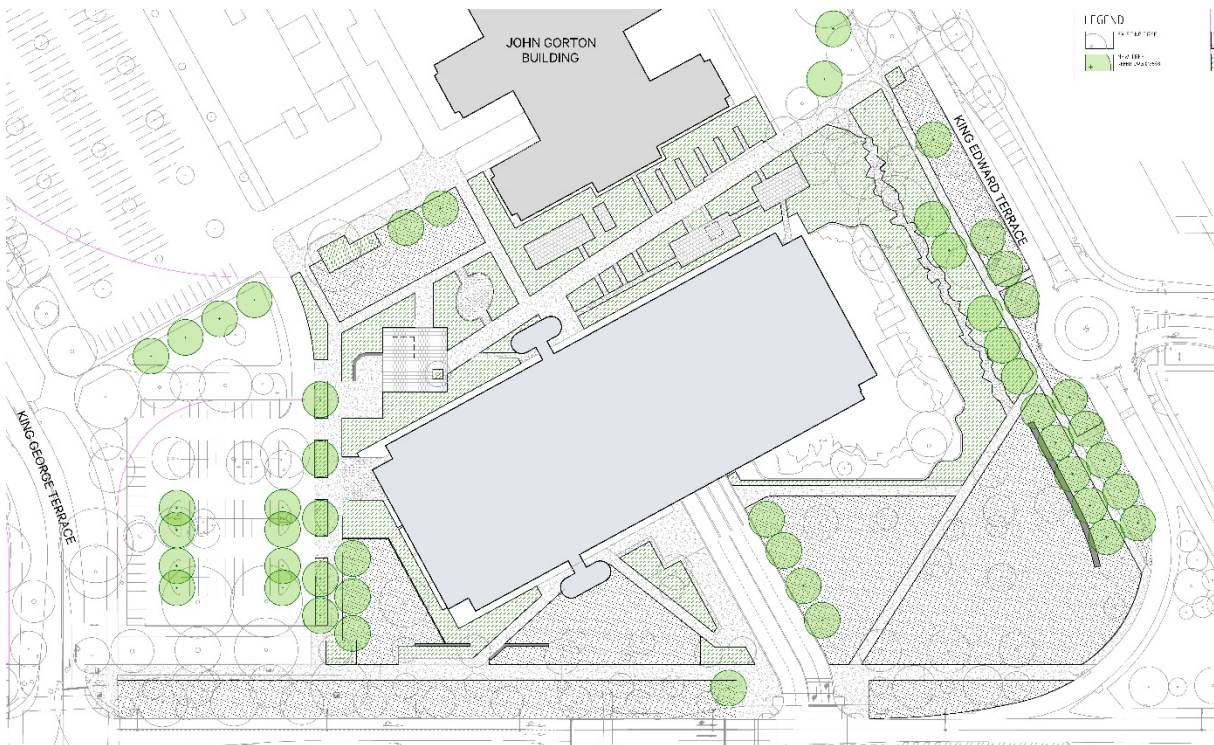


Figure 3.22 Proposed landscape plan showing large areas of turf to the bottom (east) of the development area. (Source: Oxigen, October 2022)

3.2 John Gorton Building Campus Masterplan

As part of the proposed carpark building, a masterplan for the area surrounding the John Gorton Building campus has been developed by the project team to provide a contextual basis to understand the carpark. This was a recommendation of the preliminary heritage advice provided by GML to the design team in December 2020.

The aim of this recommendation was to achieve a deeper understanding of the site context to inform the design development and functional needs while conserving the heritage values of the John Gorton Building, in the context of the Parliamentary Zone.

The campus masterplan includes schematic, or a preliminary analysis of the potential future development at the site. It identifies that a future commercial building could be constructed to the south of the site (Figure 3.22). Combined with the carpark this building would create a forecourt, or curtilage, around south and east elevations of the John Gorton Building.



Figure 3.23 Proposed final masterplan with the carpark located in the northeast corner of the site and a potential future core function building to the southwest completing the 'campus'. (NB: design shows an earlier 'oblong'-shaped proposal for carpark structure). (Source: BVN Design Report, 2 November 2021, p 116.)

3.3 Alternatives to the Proposed Action

An important part of the EPBC Act process in assessing a proposal that has, may have, or is likely to have a significant impact on the environment (including Commonwealth Heritage values) is to provide information that demonstrates that all alternatives to a proposed action have been explored. The consideration of alternatives assists in providing a comparative assessment of impacts on the heritage values.

The design process for the carpark project included exploration by BVN of function, scale, siting and material, amongst others. Appendix A—Exploration of Alternatives was prepared by KPMG and BVN, and outlines the alternatives that were explored and dismissed to demonstrate the suitability of the proposed solution.

The following categories were explored by the team and are discussed in detail in Appendix A:

- no action—eg 'do nothing', leaving the existing carpark(s) in place;
- different location—eg another potential carpark or park-and ride site outside the Parliamentary Zone;
- different location—eg another site within the Parliamentary Zone reuse or otherwise;
- adaptation or expansion of an existing carpark/building site—eg repurposing an existing building, or within, or outside the Parliamentary Zone;
- different façade materiality;
- different massing options—eg introduce an underground/basement carparking solution;
- further design development—eg extend the project timeframe to explore other options; and
- reduced scale—eg reduce the number of carparking spaces that is required.

Several building designs were considered. In particular, the proposed action has undergone a significant design progression in materiality, form and footprint since early design iterations. In April 2021 a lozenge-shaped design was issued with a COR-TEN steel façade wrapped around the building. After further design explorations and in accordance with recommendations in the Draft Heritage Impact Assessment (GML, May 2021), in October an updated design was issued—a rectangular carpark, with a combination of COR-TEN and concrete façade material, which is set back from and aligned with JGB and a smaller footprint than the lozenge design. The design has been revised and finessed since this time to the design now which has more protruding stair wells and the updated landscape design.

Figure 3.23 – Figure 3.27 show a sample of alternatives explored. The full extent of alternatives considered is set out in the Design Report and the Environmental Analysis Report prepared by KPMG, BVN and GHD (November 2021).

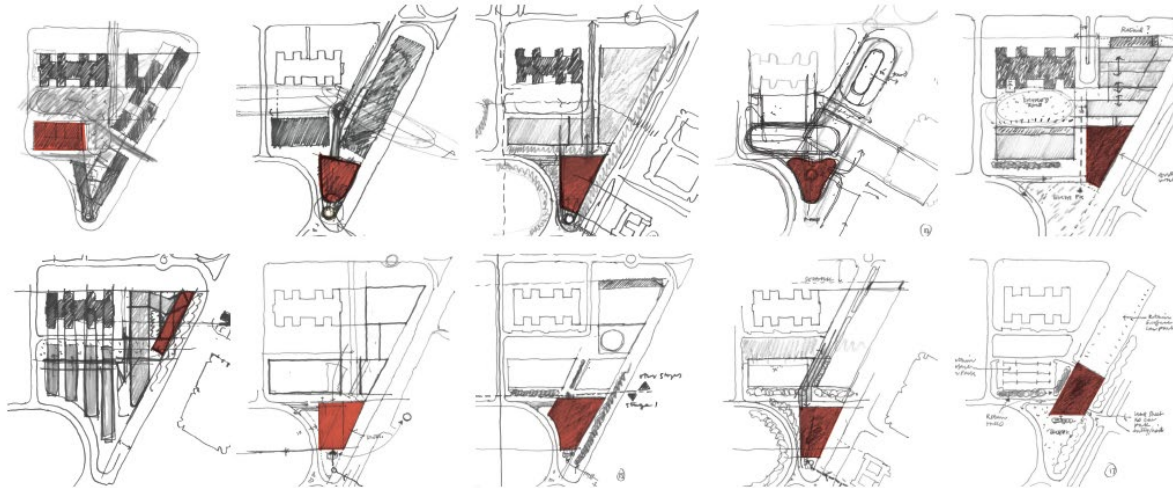


Figure 3.24 Siting options explored in the concept design stage in the vicinity of the John Gorton Building. (Source: BVN Design Report, December 2021, pp 100, 101)



Figure 3.25 Photo montage view of the proposed building from King Edward Terrace, showing the possible outcome of including one basement level (NB: Photo montage shows earlier design iteration with building fully clad by COR-TEN). Refer to Figure 3.7 for comparison of the full height proposed building. (Source: BVN, 21 July 2021)



Figure 3.26 Section view of oblong/lozenge design option for carpark and including two basement levels. (Source: BVN 21 July 2021)



Figure 3.27 Architectural render of one of the early proposed design alternatives, showing a timber façade option. (Source: BVN Design Report, December 2021, p177)



Figure 3.28 Architectural render of April 2021 design proposal, showing oblong/lozenge shape of the building and wrap-around COR-TEN cladding (Source: BVN, 2 November 2021).

3.3.1 Commentary on Heritage Impacts of Alternative Design Options

Alternatives which involved not constructing the carpark or constructing it in another location, outside the Parliamentary Zone, would have no or a significantly reduced impact on the heritage values of the study area.

Design in Context

Undertaking appropriate ‘design in context’ is usual practice when designing buildings, and is particularly relevant when designing a new structure that fits comfortably within, or adjacent to significant heritage places. As described above the project team explored alternative design solutions to establish characteristics that were believed would complement the John Gorton Building and the Parliamentary Zone.

A recommendation made by GML Heritage during this project was for Finance to seek advice from a heritage expert to provide peer review on the building design, to ensure the proposed design takes all opportunities to respond sympathetically to the heritage values of its Parliamentary Zone setting.

As a response to this recommendation and as part of process to consider alternatives, KPMG and Finance sought peer review from Fender Katsalidis Architects to study the design of the proposed carpark building and provide conclusions about the response of the building to the heritage values of its setting. Fender Katsalidis reviewed the building in the context of its use, siting, orientation, formation, form, mass and articulation, location, the appropriateness of the building next to the John Gorton Building and materiality and colour. Their review found that generally the proposal was suitable and in accordance with the relevant heritage management plan policies.

Table 3.1 summarises the heritage commentary on the alternative designs explored, building on the advice provided by GML over the project program. The alternatives that BVN explored have been categorised under the subjects of scale and form, function and character and detailing, materials and colour in the table below.

From a heritage impact assessment point of view, the selected design is sympathetic to the heritage values of the study area to a degree, but still would still adversely impact the heritage values of the study area. However, the proposal (a five-storey, no basement carpark) has been deemed by the design team to be the most suitable option. (Refer to the findings of Appendix A.)

A full heritage impact assessment of the final design proposal is provided in Section 4.

Table 3.1 Exploration of alternatives and design in context commentary

Alternative Designs Explored	Heritage Commentary on Alternatives
Location and Delivery	
<p>As discussed in Appendix A, options were considered in relation to the location and delivery of the building. These included:</p> <ul style="list-style-type: none"> • Considering whether the proposed action should occur or no development should be undertaken—dismissed. • Constructing the carpark in an alternative location within or outside the Parliamentary Zone—dismissed. • Selecting a location within the Parliamentary Zone that would have a reduced visual and environmental impact in comparison to other locations—implemented. 	<p>Heritage commentary on the location and delivery of the alternative design options.</p> <ul style="list-style-type: none"> • Alternatives such as not constructing the building or constructing it in another location outside the Parliamentary Zone would have little or no impact on the heritage values of the study area. • The Parliamentary Zone is a highly sensitive heritage landscape, and development at other ‘campus’ locations would all be likely to have impacts on the heritage values of the area and associated significant buildings. Some locations, such as adjacent to Old Parliament House, could more directly impose on significant view lines and spatial relationships than the proposed location.
Scale and Form	
<p>As described in Appendix A, options to reduce the scale and alter the form and were explored, some were implemented, and others dismissed. Key options explored included:</p> <ul style="list-style-type: none"> • Reducing the scale of the carpark by having one or two basement storeys—dismissed. • Reducing the scale by introducing multiple storeys of office/retail uses in addition to multiple storeys of carparking, both above and below ground—dismissed. • Matching the height of the carpark with the highest point of the John Gorton Building—dismissed. • Reducing the scale and height from a 1500 capacity carpark over six above ground storeys to a reduced capacity 	<p>Heritage commentary on the proposed scale and form of the alternative design options:</p> <ul style="list-style-type: none"> • The proposed action, although deemed by the project team to be the most suitable outcome, remains as a prominent intrusion in the Parliamentary Zone, with its scale and form creating a large mass. It may dominate the John Gorton Building. • However, the options explored have resulted in an outcome of reduced physical bulk and more suitable siting than earlier proposed options. • The reduction in height from the previously proposed height equalling the top of John Gorton Building is a more appropriate outcome. • The ‘lozenge’ or ‘banksia’ shape alternative which was previously proposed ensured

Alternative Designs Explored	Heritage Commentary on Alternatives
<p>of 1154 carpark spaces over five above ground storeys—implemented.</p> <ul style="list-style-type: none"> Reducing the height of the carpark to meet the lower shoulder of the John Gorton Building—implemented. Reducing the footprint that the building occupies by exploring the 'lozenge' and other design shapes—implemented. 	<p>that the building required a smaller physical footprint than a rectangular footprint, and a wider setback from the John Gorton Building. However, this shape was not as suitable for the heritage values of the area in a broader complementary design context, as it did not reflect the rectangular monumental design language of the John Gorton Building and Parliamentary Zone. While it did reflect the oblong planning shapes of the Griffin Plan road geometry, these shapes have been eroded over time and were present through the road layout rather than building architecture.</p> <ul style="list-style-type: none"> Further reductions of the impact could be addressed through introducing one or two basement levels. Basement levels could lessen the impact on the character of the cultural landscape, as demonstrated in the views analysis documentation prepared by BVN.³ A reduced scale may also be more appropriate to the auxiliary function and use as a carpark. Basement levels may assist in reducing the impact to the existing buildings' role in symbolising Australian democracy and government, which comes from their purpose, location, scale and setting.
Function and Character	
<p>As described in Appendix A alternative functions and characters were explored, some were implemented, and others dismissed. Key options explored included:</p> <ul style="list-style-type: none"> Incorporating commercial office and retail accommodation on the various floors and a childcare facility occupying a full floor. Carparking would supplement these functions either on the above or below levels—dismissed. 	<p>Heritage commentary on the proposed function and character of the alternative design options:</p> <ul style="list-style-type: none"> The options do not directly contribute to the primary government and cultural functions of the Parliamentary Zone. It would be the first multistorey carpark building in the Parliamentary Zone.

Alternative Designs Explored	Heritage Commentary on Alternatives
<ul style="list-style-type: none"> Initial retail facilities were considered within the footprint of the building, however the project team determined that the current facilities within the John Gorton Building are sufficient for the existing office population—dismissed. The incorporation or provision for retail in the future use of the building by increasing the height of the first storey to 4m. The proposed outcome allows for future retail at the within the building—implemented. 	<ul style="list-style-type: none"> However, the childcare facility is a complementary function for the Parliamentary Zone and is a positive outcome. Alternatives with greater space dedicated to direct government or cultural functions would be more sympathetic to the heritage values and better justify the presence of ancillary uses such as parking and retail.

Alternative Designs Explored

Heritage Commentary on Alternatives

Details, Materials and Colour

As described in Appendix A alternative detailing, materials and colour were explored, some were implemented, and others dismissed. Key options explored included:

- A variety of materials and the application for the architectural expression of the carpark façades were explored during the design phases, including numerous material options, see Table A1—dismissed.
- It was encouraged through the heritage advice to explore materials and colourings that were appropriate to the existing palette of the Parliamentary Zone. The project team deemed that the selected material should have ‘terrestrial’ qualities, be capable of developing a patina and contribute to the monumentality of the built environment of the Parliamentary Zone—implemented.⁴

Heritage commentary on the proposed **detailing, materials and colour** of the alternative design options:

- Several of the design materials considered and dismissed (eg aluminium, timber) were unsympathetic to the design character and language of the Parliamentary Zone landscape, which is characterised by monumentality and the use of concrete and stone. Rejection of these materials avoided associated impacts on the heritage values of the study area from unsuitable design in context.
- Some options considered (eg precast concrete) offer colour or material palettes closer to those existing in the Parliamentary Zone, which may result in a lower heritage impact and a more sympathetic and characteristically appropriate building for that environment.
- The selected combination of a combination of COR-TEN cladding and precast concrete has been deemed by the project team to be suitable in a broader sense (as described in Appendix A).
- The use of COR-TEN steel is not reflected in the design language of the Parliamentary Zone, and is a greater variation from the heritage character of the Parliamentary Zone and John Gorton Building study area than alternatives which made more extensive use of sympathetic materials (eg: pre-cast concrete).
- However, the proposed combined use of the COR-TEN and precast concrete is a more sympathetic option with comparatively reduced heritage impact than some other alternatives considered or a fully COR-TEN cladding.

3.4 Endnotes

- ¹ BVN, 2021 Design Report, dated 26 February 2021, p 89.
- ² BVN, December 2021, 'John Gorton Campus Carpark Design Report', p 6.
- ³ BVN, 2021 Design Report, dated 26 February 2021, p72.
- ¹ Pers Comms, Oxigen 17 October 2022
- ² Pers Comms, Oxigen 17 October 2022
- ³ BVN, 210721 John Gorton Building Basement Studies Rev B.
- ⁴ BVN, 2021 Design Report, dated 26 February 2021.

4 Heritage Impact Assessment

4.1 Introduction

This section comprises the assessment of potential impacts of the proposed action on the heritage values of the John Gorton Building and those present in the Parliamentary Zone (including the Parliament House Vista, The Treasury Building, Canberra—The Planned National Capital, and National Land Roads).

Under the EPBC Act, all heritage values on Commonwealth land, whether listed or not, are protected (see Section 1.4.1). The following assessment considers the impact of the proposed action on all relevant heritage values.

4.2 Method for Assessing Heritage Impacts

4.2.1 Grading the Scale of Impact

The method for assessing the impact follows a graded scale that has been adopted from the *Significant Impact Guidelines 1.1 and 1.2* (DoE 2013) and applied for this impact assessment in Section 4.3. The following terms assist in distinguishing between different levels of potential impacts to the heritage values:

- **Severe/significant**—Severe impacts generally have two or more of the following characteristics:
 - (a) permanent/irreversible;
 - (b) medium–large scale; and
 - (c) moderate–high intensity.

This level of impact is the threshold for the Department of Finance to consider making an EPBC Act referral.

- **Moderate**—Moderate impacts generally have two or more of the following characteristics:
 - (a) medium–long term;
 - (b) small–medium scale; and
 - (c) moderate intensity.
- **Minor**—Minor impacts generally have two or more of the following characteristics:
 - (a) short-term/reversible;
 - (b) small-scale/localised; and,
 - (c) low intensity.

The severity (degree) of an impact alone does not necessarily indicate a significant impact on the overall heritage values of a place. The potential impacts of the action must

be considered in the context of the environment or the place in which the action will take place.

The scale of an action and its impacts requires consideration when predicting the degree of impacts; generally, a larger-scale action with widespread impacts is more likely to have a significant impact on the heritage values than a smaller-scale action with localised impacts. Considering the scale in conjunction with the intensity and duration/frequency of the impacts is important. Intensity refers to the strength and concentration of potential impacts.

The Significant Impact Guidelines provide further guidance for the assessment of impacts on heritage values, including the thresholds of significance for impacts on heritage values under the EPBC Act.

The Guidelines state that an action is likely to have a significant impact on relevant heritage values if there is a real chance or possibility it will cause one or more heritage values to be lost, degraded or damaged, or notably altered, modified, obscured or diminished. Examples of actions likely to have a significant impact include actions where there is a real chance or possibility that the action will:

- involve the construction of buildings or other structures within, adjacent to, or within important sight lines of, a heritage place which are inconsistent with relevant values, and
- make notable changes to the layout, spaces, form or species composition of a garden, landscape or setting of a heritage place in a manner which is inconsistent with relevant values.

Relevant policies in the related heritage management plans (as listed in this report and Appendix C) have also been used to guide a determination of the degree of impact on heritage values.

Table 4.1 lists the method for assessing impacts on the heritage values of a Commonwealth and National Heritage place.

Table 4.1 Applying the heritage impact assessment method.

Phase of Heritage Impact Assessment	Understanding Heritage Values and Attributes	Analysis of Potential Impact	Heritage Impact Statement
Explanation	The heritage values and attributes specific to the space or area of the proposal/proposed action to be described.	An analysis of potential impacts on the heritage values, discussed in the frame of the following question: is the proposed action and/or design proposal in keeping with or complementary to the heritage values?	A final statement of heritage impact resulting from the proposed action is provided, identifying the grading and degree/severity of the impact, such as from (a) duration, (b) scale or(c) intensity.

At the end of this report, recommendations are provided as suggested measures to avoid or mitigate any identified adverse impacts.

4.3 Assessment of Impacts

The following discussion is an analysis of the proposed action (the construction of a multistorey carpark) on the heritage values of the place, as summarised in Section 2 and Appendix C.

As described in Section 3, the project team explored multiple alternative options to the proposed action. While assessing the most suitable proposal, the project team identified issues in the alternative options relating to timing, cost, energy use, function and use, proximity to high density office populations, amongst others. It was the cumulative result of the assessment of these factors, as well as the possible impacts to the heritage values, that resulted in progression of the proposed action—a five-storey above ground carpark. The heritage impact of this proposed action is assessed in the following table.

Table 4.2 Assessment of impacts from the proposed action on the heritage values.

Understanding Heritage Values and Attributes	Analysis of Potential Impact of the Proposed Action	Heritage Impact Statement
<p>The Parliamentary Zone</p>		
<p>The Parliamentary Zone is a designed cultural landscape, with significance for the way the purpose, location and design of buildings demonstrate the dignity, status and function of the national capital within the National Triangle.</p> <p>This heritage significance is recognised in multiple heritage places and values, briefly summarised here (and in Appendix C):</p> <ul style="list-style-type: none"> • The Parliament House Vista is the core of the most ambitious and most successful example of twentieth century urban planning in Australia. • Canberra, the Planned National Capital—demonstrates a high degree of creative and 	<p>The proposed action:</p> <ul style="list-style-type: none"> • would be likely to obscure the ability to read the story of Australian democracy as intended through the Parliamentary Zone landscape. As a large-scale, permanent development dedicated to an ancillary function, the proposed action would alter the intended character of the Parliamentary Zone primarily dedicated to cultural and governmental space. It would be the first multistorey carpark building in the Parliamentary Zone; • would diminish the ability to appreciate the designed views and landscape character of national buildings within a parkland setting. The national buildings such as the John Gorton Building reflect the dignity and status of the national capital, and the carpark would indirectly but permanently detract from this heritage significance due to its non-governmental purpose and visual competition from its large size and novel materiality; • would notably alter the underlying road geometry of the Parliamentary Zone, currently balanced with the Treasury Building road geometry to the west, removing the NDCD-era Dorothy Tangney Place and altering the Griffin-designed road geometry with the addition of a new intersection off Kings Ave; • would degrade to some degree the Parliament House Vista’s landscape aesthetic of architectural massing accentuated by planned open spaces. The large scale of the building and physical proximity to the John Gorton Building might obscure the 	<p>Grading of the impact: The proposed action would have a significant impact on the heritage values of the Parliamentary Zone.</p> <p>Explanation of the degree of impact: The proposed structure would:</p> <ul style="list-style-type: none"> • be a permanent and non-reversible one-off addition to the Parliamentary Zone, adjacent to the John Gorton Building (unless future demolition of the structure was proposed); • be medium-large scale in the setting and context of the Parliamentary Zone; and • of moderate intensity due to the strong physical and visual presence of the building within the sensitive landscape context.

Understanding Heritage Values and Attributes	Analysis of Potential Impact of the Proposed Action	Heritage Impact Statement
<p>technical achievement in town planning, urban design and urban horticulture.</p> <ul style="list-style-type: none"> • 'National Land' Roads— is an integral and major part of the Griffin Plan (the competition plan of 1911/1912, the 1913, 1918 and the Gazetted 1923 plan) and its realisation is associated with the evolution of the designed cultural and urban landscape of the central national area of Canberra. 	<p>ability to distinguish visual layering in the landscape created by the positioning of buildings within planted surrounds. The rectangular design of the building, reflecting the horizontality of the landscape layers, moderates this impact;</p> <ul style="list-style-type: none"> • would alter the predominantly balanced geometric character of the Land Axis corridor by adding additional mass to the eastern side of the axis (although future developments in the Treasury Building precinct could provide this balance); • would degrade the remaining evidence of the 1920s Charles Weston oblong shaped planting pattern within the area proposed for the carpark and landscaping; • would remove a number of other trees within the existing surface level carpark, causing a low-intensity reduction of the significant high proportion of tree planting in the public domain within the central area of Canberra. This impact could be reduced by implementing a planting program based on historical evidence and Parliamentary Zone planting precedents; and • may obscure the special association the Australian community has with the Parliamentary Vista because of its social values as a symbol of Australia and the Federal Government, by adding physically prominent non-governmental uses. <p>The impacts of the proposed action are not consistent with several management policies of the Parliament House Vista Heritage Management Plan designed to conserve and manage the significance of the place. In particular it:</p>	

Understanding Heritage Values and Attributes	Analysis of Potential Impact of the Proposed Action	Heritage Impact Statement
	<ul style="list-style-type: none"> • does not at this time, conserve open spaces as important landscape elements, or the balanced development of the Parliamentary Zone (though future developments to the Treasury Building Precinct could provide this balance) (Policy 16); • is higher than the mature tree canopy of the area (Policy 51); • only partially draws on the palette of existing materials and colours in its predominant materials and colours (Policy 51); and • is major surface parking with limited screening (Policy 54). 	
John Gorton Building		
<p>The John Gorton Building has Commonwealth Heritage values. It:</p> <ul style="list-style-type: none"> • is significant as a good example of the inter-war Stripped Classical style; and • occupies a prominent and strategic location flanking the Land Axis within the Parliamentary Zone. • functions as a major building in the Parliamentary Zone which helps create its 	<p>The proposed construction:</p> <ul style="list-style-type: none"> • would diminish to some degree the ability to appreciate the significant view of the John Gorton and Treasury Buildings as massing frames to the land axis when moving through the Parliamentary Zone, by its moderate-intensity visual presence behind the John Gorton Building to the east when viewed from the central lawns of the Land Axis, caused by the large scale of the building; • would not reduce the ability of the John Gorton Building to demonstrate the characteristic features of the inter-war Stripped Classical style, as the elements of the John Gorton Building which express these features (eg: symmetrical façades, Classical details, simple surface treatments) will continue to be present and not directly or indirectly impacted. The proposed action also responds to the monumentality and Stripped Classical 	<p>Grading of the impact: Moderate impact on the heritage values of the John Gorton Building.</p> <ul style="list-style-type: none"> • The impact on the John Gorton Building and its setting would be of long-term duration. • The action would have a moderate intensity impact due to its strong physical presence, somewhat moderated by its positioning to the east of the John Gorton Building.

Understanding Heritage Values and Attributes	Analysis of Potential Impact of the Proposed Action	Heritage Impact Statement
<p>character as a planned landscape with national buildings in an open parkland setting.</p> <p>Together with the Treasury Building balancing its mass across the central lawns of the Land Axis, the John Gorton Building contributes to the planned aesthetic qualities* of the Parliamentary Zone as a designed, historic cultural landscape.</p>	<p>architectural style of the John Gorton Building through its rectangular form and vertical design language.</p> <p>The proposed building would not impact the balancing of mass between the John Gorton Building and Treasury Building specifically, which will retain their physical mass and designed relationship to each other. However, the building will impact the predominantly balanced geometric character of the Land Axis corridor more generally (which the JGB and Treasury Buildings contribute to) – see discussion above re: the Parliamentary Zone.</p> <p>The proposed action addresses the management policies of the John Gorton Building Heritage Management Plan designed to conserve and manage the significance of the building. In particular the action;</p> <ul style="list-style-type: none"> • is a new development adjacent to the John Gorton Building, which is not recommended, but if there is no alternative needs to be considered within the development context of the significant area of the Parliamentary Zone (Policy 9) • is an activity adjacent to the NCA elements which is not low impact, and should be considered within the heritage values and the significant area of the Parliamentary Zone (Policies 35, 36). 	
Kings Avenue as part of the Parliament House Vista		
<p>Kings Avenue has Commonwealth Heritage values as part of the Parliament House Vista. It is significant for its role as a wide tree-lined</p>	<p>The proposed construction:</p> <ul style="list-style-type: none"> • would degrade the Kings Avenue’s expression of its historic character as a wide, tree-lined avenue, an important type of landscape in Canberra’s design history, by creating a break in the avenue to accommodate the new access road, requiring localised 	<p>Grading of the impact: Low–moderate impact on the heritage values of Kings Avenue.</p> <ul style="list-style-type: none"> • The impact of the change on the heritage values of Kings

Understanding Heritage Values and Attributes	Analysis of Potential Impact of the Proposed Action	Heritage Impact Statement
<p>boulevard which frames the National Triangle, and its associated views and vistas. Its significance is also recognised in other listings and nominations such as:</p> <ul style="list-style-type: none"> • Canberra, the Planned National Capital— demonstrates a high degree of creative and technical achievement in town planning, urban design and urban horticulture. • ‘National Land’ Roads— is an integral and major part of the Griffin Plan (the competition plan of 1911/1912, the 1913, 1918 and the Gazetted 1923 plan) and its realisation is associated with the evolution of the designed cultural and urban landscape of the central national area of Canberra. 	<p>removal of trees along the verge (some of which are understood to be original 1920s plantings). This moderate intensity impact could be mitigated by the opportunity to partially reinstate a Weston planting pattern on Kings Avenue after construction.</p> <ul style="list-style-type: none"> • would alter the ability of Kings Avenue to express the historically and technically significant balanced road geometry of the Parliamentary Zone, currently matched with the Treasury Building road geometry to the west, through the installation of a new medium-scale intersection that does not align with the designed Griffin or National Capital Development Commission-era road geometry (though this could be partially addressed by future development in the Treasury precinct); • would degrade to some degree the avenue’s Griffin Plan function as a framing element of a designed cultural landscape which provides definition to the urban design of Central National Area with the landscape frontage of the Parliamentary Zone to the west and the more intensively built Barton precinct to the east. Intersections on Kings Avenue under the Griffin Plan were designed within a ‘garden frontage’ and served as an entry experience to the Parliamentary Zone, rather than being direct access roads to buildings; • would degrade the remaining evidence of the 1920s Charles Weston oblong shaped planting pattern within the area proposed for the carpark and landscaping; and • would not obscure significant views along the Kings Avenue/Capital Hill axis, due to its positioning to the west of the avenue, although it would be a visual intrusion on the broader 	<p>Avenue would be long-term, and possibly permanent.</p> <ul style="list-style-type: none"> • There would be a medium scale impact, taking into account the size of the intersection and the proposed building within the context and setting of the avenue. • There would be a low-moderate intensity impact from the action, with a notable physical change to the landscape and some physical and visual presence of the carpark within the designed landscape of the avenue.

designed cultural landscape setting of Kings Avenue (see previous point).

The impacts of the proposed action partially but not completely address relevant policies of the Parliament House Vista HMP designed to conserve and manage the significance of the place. In particular:

- the adverse impact on the heritage values of the roads is greater than the original modification to the Griffin Plan road layout, due to the fact it does not retain a balanced geometry approach and the change in nature to a terminating access road rather than an entry road to access the National Triangle [Parliamentary Zone] itself (Policy 34).
- The proposal protects significant views to a degree, but not entirely. However, it does not substantially intrude into the significant view (Policies 43, 49).

* Australian Heritage Database Record, John Gorton Building – Commonwealth Heritage Listing, http://www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=place_detail;place_id=105472

4.4 Significant Impact Determination

Under the EPBC Act actions which are likely to have a significant impact on a matter protected by the Act must be referred to the Minister for the Environment for approval (see Section 1.4.1).

A significant impact is an impact which 'is important, notable, or of consequence, having regard to its context or intensity'.¹ Determining whether the impacts of an action are significant requires a wholistic assessment, taking into account the total adverse impact of the action in the context of the environment which will be impacted, particularly those elements of the environment which are sensitive or valuable.²

The Significant Impact Guidelines provide additional specific guidance for determining whether impacts to protected heritage values are significant.

The Guidelines state that an action is likely to have a significant impact on relevant heritage values if there is a real chance or possibility it will cause one or more heritage values to be lost, degraded or damaged, or notably altered, modified, obscured or diminished.³

The Significant Impact Guidelines 1.2 also provide a non-exhaustive list of 'criteria' (questions for the proponent) to assist in determining if a proposed action is likely to have a significant impact on protected heritage values.⁴ If the answer is 'yes' to one or more of the questions listed at Table 4.3, it is expected that the action is likely to have a significant impact on the environment.

The impacts of the proposed action, as analysed in Section 4.3, above, have been considered against these criteria below.

Table 4.3 Applying the Significant Impact Guidelines 1.2 criteria related to the proposed John Gorton Building carpark.

Significant Impact Guidelines 1.2	Significant Impact?
<i>Is there a real chance or possibility that the action will:</i>	Response
<ul style="list-style-type: none"> <i>permanently destroy, remove or substantially alter the fabric (physical material including structural elements and other components, fixtures, contents, and objects) of a heritage place;</i> 	<ul style="list-style-type: none"> The proposed action would see the NCDC era Dorothy Tangney Place removed and the existing median strip of Kings Avenue altered, including the removal of some original 1920s avenue plantings. The action would alter the balanced road layout and geometry of the Parliamentary Zone, currently matched with the Treasury Building road geometry to the west, through the installation of the new intersection that does not align with the current or historic road geometry.

**Significant Impact Guidelines
1.2**

Significant Impact?

- The proposed action would permanently remove some of the historical remnants of the Weston curved planting pattern currently visible at the development site through the removal of approximately 4 Weston plantings.
- The action would permanently remove numerous other trees from the existing carpark and development site, reducing the high proportion of tree planting in the public domain within the central area of Canberra.

Yes, the action would alter or remove the fabric of a heritage place.

- *involve extension, renovation, or substantial alteration of a heritage place in a manner which is inconsistent with the heritage values of the place;*

- The proposed action would see the alteration of a heritage place including the setting of the John Gorton Building, the Parliamentary Zone and Kings Avenue, as part of the Zone, in a way that obscures the heritage significance of the Zone as a place dedicated primarily to governmental and cultural purposes.
- It alters the PZ in a manner which would diminish the ability of the John Gorton Building and other major national buildings to reflect the dignity and status of the national capital, detracting from their prominence by its large size, novel materiality and non-governmental purpose.
- The proposed action would degrade the character of Kings Avenue as a defined, tree-line boulevard by creating a break in the Avenue with a new intersection and requiring the removal of trees along the verge landscape.
- It would alter the road geometry of the Parliamentary Zone, currently matched with the Treasury Building road geometry to the west, in a way that is inconsistent with the heritage values of the Parliamentary Zone as a historical cultural landscape of balanced design and layout.

Yes, the action would involve the substantial alteration of the Parliamentary Zone in a manner which is inconsistent with the heritage values.

- *involve the erection of buildings or other structures adjacent to, or within important sight lines of, a*

- The proposed action involves the construction of a five-storey above ground carpark adjacent to the Commonwealth-listed John Gorton Building and within

**Significant Impact Guidelines
1.2**

Significant Impact?

heritage place which are inconsistent with the heritage values of the place;

the sightlines of other heritage listed places, including the Parliamentary Zone and Kings Avenue.

- It would degrade to some degree the Parliament House Vista’s landscape aesthetic of architectural massing accentuated by planned open spaces. Its large scale and physical proximity to the John Gorton Building may obscure the ability to distinguish visual layering in the landscape created by the positioning of buildings within planted surrounds.
- The proposed action would somewhat modify significant views north/south along the Kings Avenue/Capital Hill axes by its large-scale presence on the western side of this view; however, this modification would not be to an extent that it is inconsistent with the heritage values.

Yes, the proposed action would involve the erection of a building adjacent to, or within important sight lines of, the Parliamentary Zone and the John Gorton Building in a manner inconsistent with their heritage values.

- *substantially diminish the heritage value of a heritage place for a community or group for which it is significant;*

- The proposed action may obscure the ability to read the story of Australian democracy as intended through the Parliamentary Zone landscape for the Canberran and broader Australian community, diminishing these heritage values to some degree.

The action might diminish the heritage value of the Parliamentary Zone for the Australian community, but not to a substantial degree.

- *substantially alter the setting of a heritage place in a manner which is inconsistent with the heritage values of the place; or*

- The proposed action would alter the setting of the John Gorton Building by the inclusion of a large scale, new structure within its visual setting, which would diminish to **some degree** the ability to appreciate the **significant view** of the John Gorton and Treasury Buildings as balanced massing frames to the land axis. However, this will be a moderate presence due to its location behind the John Gorton Building.
- The proposed action will also alter the setting of Kings Avenue, by inserting a large scale structure to the west of the avenue within its visual curtilage. However, this alteration to the avenue’s setting would not be to an extent that it is inconsistent with the heritage values, as it only moderately impacts on the heritage values of the avenue.

Significant Impact Guidelines 1.2	Significant Impact?
	<ul style="list-style-type: none"> The proposed action would be within the Parliamentary Zone itself, rather than within its setting. <p>The action would alter the setting of the John Gorton Building and Kings Avenue heritage places, but not to a substantial degree.</p>
<ul style="list-style-type: none"> <i>substantially restrict or inhibit the existing use of a heritage place as a cultural or ceremonial site?</i> 	<p>The proposed development area is not used as a cultural or ceremonial site.</p>

4.4.1 Summary Heritage Impact Statement

Based on the analysis of impacts undertaken in Section 4.3 and Table 4.2, it is determined that the proposed action is **likely to have a significant impact** on the environment on Commonwealth land and from the actions of a Commonwealth agency, as protected under the EPBC Act.

4.5 Report Summary

The HIA finds the proposed action is **likely to have a significant impact**.

Multiple alternative programmatic, design and scope options were investigated and assessed by the project team over the length of the project. Design options that were explored included a reduction in height, various possible cladding materials, alternative functions and alternative siting options.

As described in Table 3.1, the implementation of some of these options has reduced the impact of the proposed action in comparison to several of the design proposals considered. While additional design options could result in a further reduced impact to the heritage values of the study area, considering a wider assessment approach including economic and energy consumption factors, the proposed action has been deemed by the project team as the most suitable and appropriate outcome.

The role of this HIA is to determine, specifically, the potential heritage impact the proposed action would have on the listed and identified heritage values of the site. As such, this HIA has determined that the proposed development would likely have a:

- **significant impact** on the heritage values of Parliamentary Zone (identified through the Parliament House Vista; Canberra, the Planned National Capital; 'National Land' Roads places);
- **moderate impact** on the Commonwealth Heritage values of the John Gorton Building; and
- **low-moderate impact** on the Commonwealth values of Kings Avenue.

It is a recommendation of this HIA that the proponent, Department of Finance, should refer the proposed action to the Minister for the Environment under the EPBC Act, with the HIA as relevant supporting documentation.

4.5.1 Recommendations—Design and other mitigation measures

Through the preparation of its design, the proposed action has incorporated some measures to mitigate the impacts of the development on the heritage values of the Parliamentary Zone. As identified in this report, residual significant heritage impacts remain highly likely, even after the implementation of these measures.

It is unlikely that the primary assessed significant impact associated with the construction of a multistorey building in this location can be mitigated or avoided. The following recommendations are provided with an aim to achieve a more satisfactory heritage outcome, to the extent possible. These recommendations may be appropriate for completion prior to the EPBC Act referral submission, in the assessment phase prior to a final approval, during the finalisation of construction design, or during construction and implementation.

- **Consider alternative building materials and/or colours.** The proposed building includes a combination of pre-cast concrete and COR-TEN. Buildings in the Parliamentary Zone are typically light in colour and treated or constructed in concrete, stone or rendered masonry. The selection of COR-TEN, while only partially used for the façade, is not sympathetic to the immediate context of the Parliamentary Zone, as required by the Parliament House Vista HMP. Opportunities should be considered to use alternative materials or treatments of the COR-TEN to lighten its appearance, if possible. In the instance that COR-TEN is used, the design should still seek opportunities to maximise the use of other building materials in combination with the COR-TEN.
- **Consider opportunities to reduce height and mass through design change.** While the mass has been reduced from the initial design proposals, the large height, width and mass of the proposed building contributes to it having an impact on the heritage values. It diminishes the status and primacy of government buildings in the

Parliamentary Zone, and therefore the Zone’s ability to represent Australian democracy. A building with smaller mass or a more modulated shape may detract less from the symbolic design of the Parliamentary Zone’s cultural landscape. Opportunities should also be considered to increase the ‘human scale’ of the ground floor western façade of the building, strengthening the buildings reflection of the Parliamentary Zone as a place of the people and improving activation for a potential campus square.

- **Protect historically significant trees during demolition, excavation and construction activities.** Demolition, excavation, construction, landscaping, utility services and civil works must avoid historically significant trees. Ensure works are in line with AS4970-2009 for protecting trees on development sites, particularly regarding the Tree Protection Zones (TPZ). All demolition and excavation activities within the TPZ to be supervised by the project arborist.
- **Select historically appropriate tree species.** The selected species should have been available during the 1920s and have been planted by Weston in Canberra. Generally, modern cultivars and varieties should be avoided. In the case where the modern variety or cultivar has similar values to the true species, they are acceptable if the true species is not available or would be unlikely to succeed in this location. Advice could be sought from local experts and institutions such as the Heritage Nursery, Yarralumla.
- **Consider opportunities to achieve balanced road alignments.** The proposed intersection creates a road geometry which will not be balanced with the western side of the Parliamentary Zone, nor does it reinstate historical road alignments, meaning its heritage impacts are currently greater than those of the original variations to the road geometry of the Griffin Plan/s. Opportunities to create balanced road alignments on the east and west of the Parliamentary Zone, for example through whole of environment planning for the Treasury Building campus, or by alterations to the proposed Kings Avenue intersection, would be more sympathetic to the heritage values.
- **Increase screening of the building with landscape planting.** The building has a strong physical and visual presence in the landscape and has some presence in key vistas. Increased screening through landscape plantings may result in a reduced impact. Further design development of the landscape design could include increased screening of the building, and reinstating the landscape qualities of the existing setting of the John Gorton Building to the greatest degree possible. The landscape plan should be aligned with the guidance in the NCA Tree Management Policy, 2021 and based on historical evidence of the Griffin Plan and Weston planting schemes. Refer to the below recommendation of ‘Interpret the layered, historically significant landscape.’

- **Interpret the layered and historically significant landscape.** There is an opportunity to interpret the Weston, Griffin and Murdoch influenced planting schemes and the work and life of Dame Dorothy Tangney in the landscape design. The proposed works would result in the removal of some highly significant trees and the degradation of the remaining evidence of the oblong planting pattern. Options to re-use the wood from these trees should be explored in the landscape or building design, interpretation devices (signage, inlays, etc) could be installed, the historic planting patterns could influence path or ground surface treatments. The works also remove the current Dorothy Tangney Place. Tangney’s political and social contribution should be acknowledged through signage or other creative device. It is understood that further exploration of these items will occur during the detailed design documentation stage.

4.6 Endnotes

- ¹ Department of the Environment, 2013 'Matters of National Environmental Significance: Significant impact guidelines 1.1 Environment Protection and Biodiversity Conservation Act 1999', Commonwealth of Australia, p 2.
- ² Department of Sustainability, Environment, Water, Population and Communities, 2013 'Actions on, or impacting upon, Commonwealth land, and actions by Commonwealth agencies: Significant impact guidelines 1.2 Environment Protection and Biodiversity Conservation Act 1999', Commonwealth of Australia, p 14.
- ³ Department of the Environment, 2013 'Matters of National Environmental Significance: Significant impact guidelines 1.1 Environment Protection and Biodiversity Conservation Act 1999', Commonwealth of Australia, p 19.
- ⁴ Department of Sustainability, Environment, Water, Population and Communities, 2013 'Actions on, or impacting upon, Commonwealth land, and actions by Commonwealth agencies: Significant impact guidelines 1.2 Environment Protection and Biodiversity Conservation Act 1999', Commonwealth of Australia, p 16.

Appendix A—Exploration of Alternatives

An important part of the EPBC Act process in assessing a proposal that has, may have, or is likely to have a significant impact on the environment (including Commonwealth Heritage values) is to provide information that demonstrates that all alternatives to a proposed action have been explored. The consideration of alternatives assists in providing a comparative assessment of heritage impacts.

The design process for the project included exploration by BVN of function scale, siting and material. Table A1 was prepared by KPMG and BVN with minor amendments by GML for clarity and to reflect design updates, and outlines the alternatives that were explored and dismissed to demonstrate the suitability of the proposed solution.

Considerations in determining the most suitable proposal from among the alternatives considered included heritage impacts, parking capacity requirements and accommodation of future development, construction costs and risks, and other matters as outlined below.

Table A1 Exploration of Alternatives Options—prepared by KPMG and BVN.

Suggested Alternative	Exploration of the Alternative Options (KPMG and BVN)
<p>No action—eg: ‘do nothing’, leaving the existing carpark(s) in place.</p>	<p>The need for the delivery of a structured carpark arises from the proposed development of the Commonwealth Office Precinct in Barton and the displacement of the existing on-grade parking consisting of 719 car bays. The already stressed carparking capacity within the Barton area therefore does not have the capacity to accommodate further demand. Through consultation with the NCA and abiding with the National Capital Plan (NCP) five locations for a potential carpark were considered within the five precincts of the Campus Strategy. The developed options adopted the preferred Griffin Legacy geometry parallel to King Edward and King George Terraces; making a strong alignment to Kings Avenue. In consultation with the NCA it was determined that the Kings Avenue influence on the positioning of the building should be minimised. The John Gorton Campus was nominated as the preferred location for accommodating the NCP requirements.</p> <p>The existing on-grade parking capacity adjacent to John Gorton Building consists of 777 car bays and is currently considered strained, it is also understood that the NCP proposes future growth of government agency functions for the John Gorton Campus.</p> <p>The option of ‘No Action’ was considered and eliminated due to current capacity, future development and the displacement from the proposed Commonwealth Office Precinct development.</p>

Suggested Alternative	Exploration of the Alternative Options (KPMG and BVN)
<p>Different Location—eg: another potential carpark or park-and ride site outside the Parliamentary Zone.</p>	<p>Different locations outside of the Parliamentary Zone were explored comprehensively and proved problematic. The five identified campuses within the NCP were considered with the following criteria:</p> <ul style="list-style-type: none"> • a developable site within acceptable walking distance from the proposed Commonwealth Office Precinct, including providing a convenient and safe pedestrian route. Advice recommended a 400m radius would be preferable, with a distance greater than 800m not feasible; • the availability of Commonwealth managed land within Barton; and • a site that enables efficient traffic pathways and efficiently connects the greater traffic network for providing convenient access and egress to and from site <p>After careful consideration of the five potential parliamentary campus locations, no feasible location outside of the Parliamentary Zone met the above criteria except the JGB Campus.</p> <p>See Appended Section 1.01 of the December 2021 Design Report - Determining The Site of John Gorton Campus Carpark.</p>
<p>Different Location—eg: another site within the Parliamentary Zone reuse or otherwise.</p>	<p>No other locations within the Parliamentary Zone, outside of these two campuses, were deemed appropriate for structured carparks. The Treasury Campus was viewed outside the suitable walking radius from the Commonwealth Office Precinct and thus eliminated. Additionally, the development of alternative existing on-grade carparks outside of these two campuses proved to have too significant visual and environmental impact to be feasible.</p> <p>A series of siting options were explored within the John Gorton Campus, all of which were accessed on the various urban design outcomes for the campus (including in the context of a new public realm and future masterplan), functional requirements of carparking and heritage impacts on the existing buildings of the Parliamentary Zone. Five siting options for the structured carpark were explored in detail, including sites south of the John Gorton Building and aligned with King George Terrace. All these siting options to the south of the John Gorton Building were seen to have significant impact, including adverse visual impacts on the surrounding buildings and public spaces, and have significant traffic implications to the existing network of the Parliamentary Zone. See Appended Section 2.07 of December 2021 Design Report: Developed Site Options of John Gorton Campus Carpark. Through consultation with the NCA, the site to the east of the John Gorton Building was nominated as the preferred location. Reasons for this included:</p>

Suggested Alternative	Exploration of the Alternative Options (KPMG and BVN)
	<ul style="list-style-type: none"> the closure of Dorothy Tangney Place and the reinstatement of the road network greater aligned to the original Griffin intent; the associated upgrades to Kings Avenue and the opportunity to reinstate the original Charles Weston planting plan; the opportunity to extend Blackall Street into the campus through introducing the Blackall Street and Kings Avenue intersection. This creates a traffic network plan greater aligned to the original Griffin geometry; providing the opportunity to consolidate a developable site to the south of the John Gorton Building, for future government agency functions proposed for the campus as proposed in the NCP; efficient traffic pathways to and from the structured carpark, and the lessened implications on the surrounding network of other options; and the lessened visual impact on the existing John Gorton Building as compared with other siting options.
<p>Adaptation or expansion of an existing carpark/building site—eg: repurposing an existing building, or within, or outside the Parliamentary Zone.</p>	<p>Expansion of existing carpark capacity within and outside of the Parliamentary Zone was explored and deemed not feasible. There is limited opportunity for an appropriate site that meets the criteria of being within acceptable walking distance from the Commonwealth Office Precinct, being Commonwealth managed, provide efficient vehicular access and limiting heritage impacts. See Appended Section 1.01 of December 2021 Design Report: Determining the Site of John Gorton Campus Carpark.</p>
<p>Different façade materiality</p>	<p>A variety of materials and applications for the architectural expression of the carpark façade were explored during this initial design phase. The façade types range from aluminium façades to timber. It is considered that the façade should be related to the buildings within the Zone.</p> <p>Typically, these will have terrestrial qualities, be capable of developing a patina and participate in the monumentality of the built environment of the Parliamentary Zone. The following materials were explored.</p> <p>Aluminium</p> <p>Aluminium extrusions were explored in an intersecting form of various colours and finishes. This material selection was deemed to not be a feasible solution for the following reasons:</p> <ul style="list-style-type: none"> sustainability issues with aluminium’s high embodied energy in manufacturing and recycling;

Suggested Alternative

Exploration of the Alternative Options (KPMG and BVN)

- although anodised aluminium does develop a strong patina equivalent to an aging material, the surface does remain reflective. This patina was viewed as not compatible with other materiality of the Parliamentary Zone;
- a powder-coated finish (factory paint finish) also fades, depending on differing exposure to the sun. Although this does achieve a change in material finish in time, the resultant was also viewed as not an appropriate quality or language for the Parliamentary Zone; and
- in discussion with NCA it was agreed that a non-patina material (aluminium) would not be compatible with the patina character of masonry.

Timber

Various timber façades were considered, including façades with woven architectural expression, intersecting and battens consisting of various sizes and alignments. This material selection was deemed to be not a feasible solution, for the following reasons:

- timber was initially investigated for sustainability reasons. The timber species required to endure the lifetime of the structure would have meant an Australian hardwood would have to be specified. Concerns were raised regarding the ongoing material maintenance for this and the ongoing application of oil treatment to achieve no splitting, bowing or degrading of the material;
- further, concerns were raised that timber was not seen as a compatible material compared with the monumental expression of the John Gorton Building. Additionally, the consistent patina of the timber over time was not seen to compliment the rich diversity in shades and tones of the stone of the John Gorton Building.

Precast Concrete

Precast concrete was explored for the monumental expressive characteristics it signifies. Precast concrete was not considered suitable as a complete façade option for the following reasons:

- the potential discolouring of the surface through air-borne particle pollution from vehicles over time;
- the necessary thickness as a structural material for precast panels meant a dense and heavy façade expression, seen as not a favourable outcome;

Suggested Alternative

Exploration of the Alternative Options (KPMG and BVN)

- precast panels are commonly applied to carpark structures, and thus this expression was not seen as favourable as it symbolically denotes the structures function as a carpark; and
- the increased structural requirements, including thicker slabs and beams, required to accommodate the heavy façade.

However, precast concrete was determined to be suitable as a partial material for the northern and southern sides of the façade. This was selected to reference the monumentality of the Parliamentary Zone, as well as for its abstract resonance with the shape and expression of banksia seed pods, also referenced in COR-TEN material (see below).

In addition, precast concrete has low maintenance requirements and longevity, contributing to the sustainable profile of the development.

Glass Reinforced Concrete

Glass Reinforced Concrete (GRC) was explored as a viable, lightweight alternative to precast concrete, requiring less structural provisions. GRC was explored and not seen feasible for the following factors:

- to enable the ventilation requirements while maintaining visual opaqueness, each GRC element required an articulated profile. This proved a very costly outcome;
- as byproducts of the manufacturing and form-making process, GRC elements result in one side textured while the other smooth. The different expressions between both sides was not seen as a favourable outcome; and
- GRC retains a consistent colour in aging. This was not a favourable outcome, and not sympathy with the rich diversity of the John Gorton Building façade.

Glass Planks

Various types of glass were considered, including glass block, frosted panels and glass planks. Glass was not seen as a feasible façade option for the following reasons:

- the requirement of 50% transparency for ventilation while masking the vehicles behind became significantly more difficult;
- glass as a major façade material was an expensive design solution;
- cleaning concerns were raised and the associated increase of maintenance and cleaning to maintain a glass expression;

Suggested Alternative

Exploration of the Alternative Options (KPMG and BVN)

- unless entirely opaque, the glass would allow for the reading of the structure as a carpark which was an undesirable outcome; and
- concerns were raised regarding on-going maintenance, and how future panel replacement would be completed.

However, glass planks were deemed suitable to clad the expressed cores of the building. Glass planks were suitable for these specific locations because they:

- allow clear signalling and wayfinding of the entry and exit points;
- allow ventilation and light into the egress stair; and
- the expressed location of the cores would provide protection from air-borne particles, and thus cleaning issues would be mitigated and minimised.

COR-TEN

COR-TEN (Corten) was explored and seen as the preferred solution for use on the building façade, combined with precast concrete. Apart from the architectural expressive issues noted above, Corten was the favourable material selection for the following factors:

- COR-TEN can be formed into structural, rigid panels of varied size and shape. Through an interlocking pattern of panels, the 50% ventilation requirements could be achieved while also appearing as an opaque façade to conceal the vehicles inside the carpark;
- no maintenance would be required;
- a visible patina would occur through the oxidisation of the surface. Exposure to weather and sunlight causes a rich variation in patina over time. This was deemed favourable and compatible with the rich diversity of stone tones of the John Gorton Building;
- COR-TEN speaks truly to an Australian expression, and one deeply rooted in place;
- the structural rigidity of each panel would allow each element to be fixed directly each slab edge. This eliminates the need for substructure and limits structural requirements; and
- each panel would be prefabricated, allowing ease of construction, short construction time and thus limited on-site disruptions.

The detailed proposal for the façade is based on a computational method, which creates a random pattern across the entire façade. It

Suggested Alternative	Exploration of the Alternative Options (KPMG and BVN)
-----------------------	---

refers to the random colour and texture of the masonry expression of the John Gorton Building. The pattern is based on a predetermined number of components with varying lengths and profiles. It would ensure a random shadow pattern and a variety of glimpse views into the carpark.

The aggregated effect of the Corten materiality, a varied reflectivity due to a varying material patina, the shape and orientation of the panels and the random façade panel placement all combine to produce an architectural expression lacking formal order.

It is the lack of formal order that gives the carpark its distinctive architectural character, relates it in detail and form to the banksia reference, creates a blurred oxide colour patina, and refers in a very contemporary manner to the staccato façade architecture of the John Gorton Building.

COR-TEN in this arrangement would allow the carpark to be naturally ventilated with a 50% transparent (to air) aperture. Mesh would be installed at each opening in the façade at the edge of the structural slab, obscuring direct lines of sight to cars and the interior of the structure.

Different massing options—eg introduce an underground/basement carparking solution.

Basement level carparking was explored in multiple configurations and locations within the John Gorton Campus. A basement configuration was explored and subsequently eliminated for several reasons, including:

- construction time implications from the additional time required for excavation;
- the risk from existing watertable conditions;
- proximity to the heritage-listed Communications Bunker of the John Gorton Building and risks associated during construction;
- increased initial and ongoing cost implications of a basement solution, particularly related to additional mechanical plant requirements and environmental issues arising from groundwater discharge;
- a basement solution did not allow the development to include auxiliary functions, including retail and childcare that would provide greater activation and diversity to the precinct; and
- one of the key focuses of the area is one of sustainability, which would be substantially reduced by the introduction of a basement.

Additionally, a mixed-use development was proposed, consisting of basement parking with the ability to accommodate future commercial

Suggested Alternative

Exploration of the Alternative Options (KPMG and BVN)

development above in subsequent stages. This was also seen to be not feasible, particularly due to cost implications.

Hybrid alternatives were also explored, consisting of both above-ground and below -ground levels in a standalone carpark structure. Whilst it is acknowledged that these alternatives do lower the overall building height and thus visual impact on the adjacent John Gorton Building, these options were not seen to be advantageous for the following reasons:

- The initial intent was to maintain natural ventilation for the carpark, eliminating the need of mechanical ventilation systems and fire sprinkler systems. The inclusion of a basement reduces the carpark efficiency through the requirement of plant allocation, plus additional excavation to accommodate ventilation ductwork and plant equipment. Additionally, these systems incur initial and on-going cost implications, as well as sustainability implications with increased energy consumption.
- The carpark ventilation system introduces additional acoustic noise whilst in operation.
- The increase in materials, maintenance and embedded energy associated with the carpark retaining wall systems.
- Increased water use associated with fire sprinkler testing.
- An increased area of land would need to be disturbed because of the excavation requirements. Additionally, the disposal of excavated soil and the additional fossil fuel use associated with excavation and transport of soil were not deemed appropriate.
- The basement and above-ground configuration created traffic flow issues, including conflicting vehicle movements when exiting and entering the carpark. Additional technology for this option was required to indicate users to vacant spaces, and thus created concerns of visual permeability and light indicators being visible externally. Additional capital cost, ongoing cost and energy use would be associated with this technology.

This option also included the reasons as noted above, including implications to initial and whole-of-life costs, watertable issues, additional construction time and construction risks.

Further design development—eg extend the project timeframe to explore other options.

The delivery of the structured carpark would enable the redevelopment of the Commonwealth Office Precinct. Thus the structured carpark is a key component to enable a comprehensive, and constrained sequence of projects. It is not seen as feasible to extend the timeframe of the structured carpark to continue to explore future alternatives due to the time implications this has on the overall project timeline.

Suggested Alternative **Exploration of the Alternative Options (KPMG and BVN)**

It is understood that both current and future demand for car parking and Government Office facilities as identified above deem extended timeframes unfeasible when considering required resources beyond 2024

Reduced scale—
eg reduce the number of carparking spaces that is required.

The initial studies of the John Gorton Campus Carpark investigated a structured carpark of 1500 carpark spaces over 6 levels. This accommodated the displaced spaces of Commonwealth Office Precinct, the lost on-grade spaces consumed by the footprint of the new carpark structure, as well as contingency for the population growth proposed for the John Gorton Campus within the NCP.

A development of this scale was viewed to be not sympathetic to the area. Subsequent investigations reduced the structural bays of the carpark; thus, reducing the footprint and the apparent size of the structure. The scale of the development was further reduced through the deletion of a level.

Through consultation with the NCA and project team, it is seen as preferable to only replace the displaced spaces of Commonwealth Office Precinct and the lost spaces of the John Gorton Building carpark. Future commercial developments within the campus would include multi-level basement car parking to support the proposed population growth. The impact of the carpark was reduced further through the deletion of another floor. Coupled with the reposition of the structure to the east of the John Gorton Building, a site lower in elevation, the apparent massing of the structure was greatly reduced and the visual impact to the John Gorton Building was minimised.

Appendix B—Historical Analysis of the Development Area’s Tree Plantings

The following is an analysis of historical mapping and aerial photograph demonstrating the evolution of Charles Weston’s planting plan for the development area from the 1920’s through to current day.

Within the Parliamentary Zone, Charles Weston’s landscape design created formally shaped grassed vistas and ‘outdoor rooms’, including the location now proposed for development. Establishing the Parliamentary Zone was recognised as a priority, a way to put into practice the lofty idea of a capital city built from nothing on the plains. Weston’s planting on the Griffins’ design started to create a space of appropriate status and high-quality design. Within the Parliamentary Zone, Weston deliberately over-planted the site having in mind a quick effect and possible species performance difficulties.

A 1928 tree planting plan indicates the use of fifty different species with an emphasis on evergreen coniferous and deciduous plants generally, following paths and roadways to create suitable seasonal microclimatic ‘outdoor rooms’.

Numerous trees shown on the 1928 planting plan (Figure B1) remain on site including Plane trees (*Platanus orientalis*), Californian Incense cedars (*Calocedrus decurrens*) and Pin oaks (*Quercus palustris*). It is likely that the large Atlas Cedar (*Cedrus atlantica*) trees on the inside of the Kings Avenue hedge date from soon after the 1928 plan was prepared, but are not shown on the 1928 plan.

Table B1 Analysis of the Charles Weston plantings in the development area.

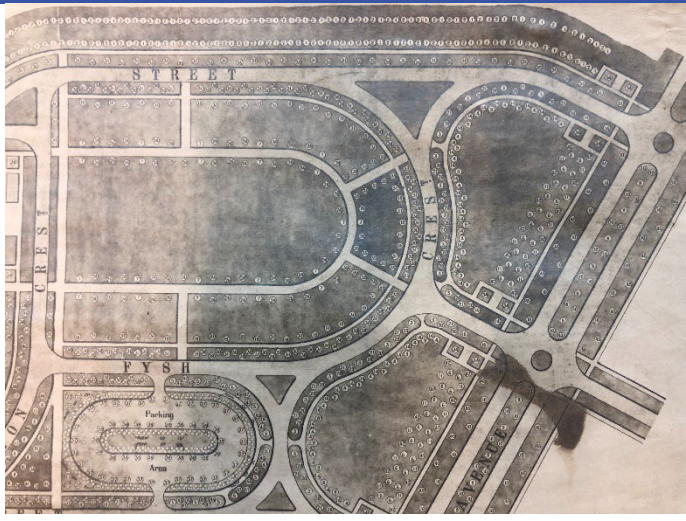
Figure Description	Figure
<p>Figure B1 Detail of the development area on the 1928 plan showing the planting in the Parliamentary Zone. The Administration Building (John Gorton Building) was later built in the large oblong shaped area.</p> <p>(Source: National Library of Australia, Bib ID: 109644)</p>	

Figure Description

Figure

Figure B2 c1930 oblique photograph of Old Parliament house in the background and the John Gorton Building construction site in the foreground. The juvenile trees of the semi-circle planting pattern shown in Figure B1 are visible. (Source: Old Parliament House Gardens HMP, January 2015, Context)



Figure B3 1951 aerial photograph showing the curved planting to the east of the John Gorton Building intact (Source: ActMapi Run 5, 29th November 1951)



Figure Description

Figure

Figure B4 1955 aerial photograph showing the curved planting to the east of the John Gorton Building intact.

(Source: ActMapi Run 7, 7.12.55)



Figure B5 By 1961 car parks had been developed to the east and south of the John Gorton Building. The curved planting is still evident but somewhat degraded.

(Source: ActMapi Run 12, 28 June 1961)



Figure B6 An alternate road and carpark had been set out by 1985. The curved planting is still evident at the northeast but degraded.

(Source: ActMapi Run 15, Mark 1985)



Figure Description

Figure

Figure B7 1997 photograph showing the trees largely as they are today, intact to the northeast and key trees still evident along the roads.

(Source: ActMapi, Run 15, 26.3.1997)

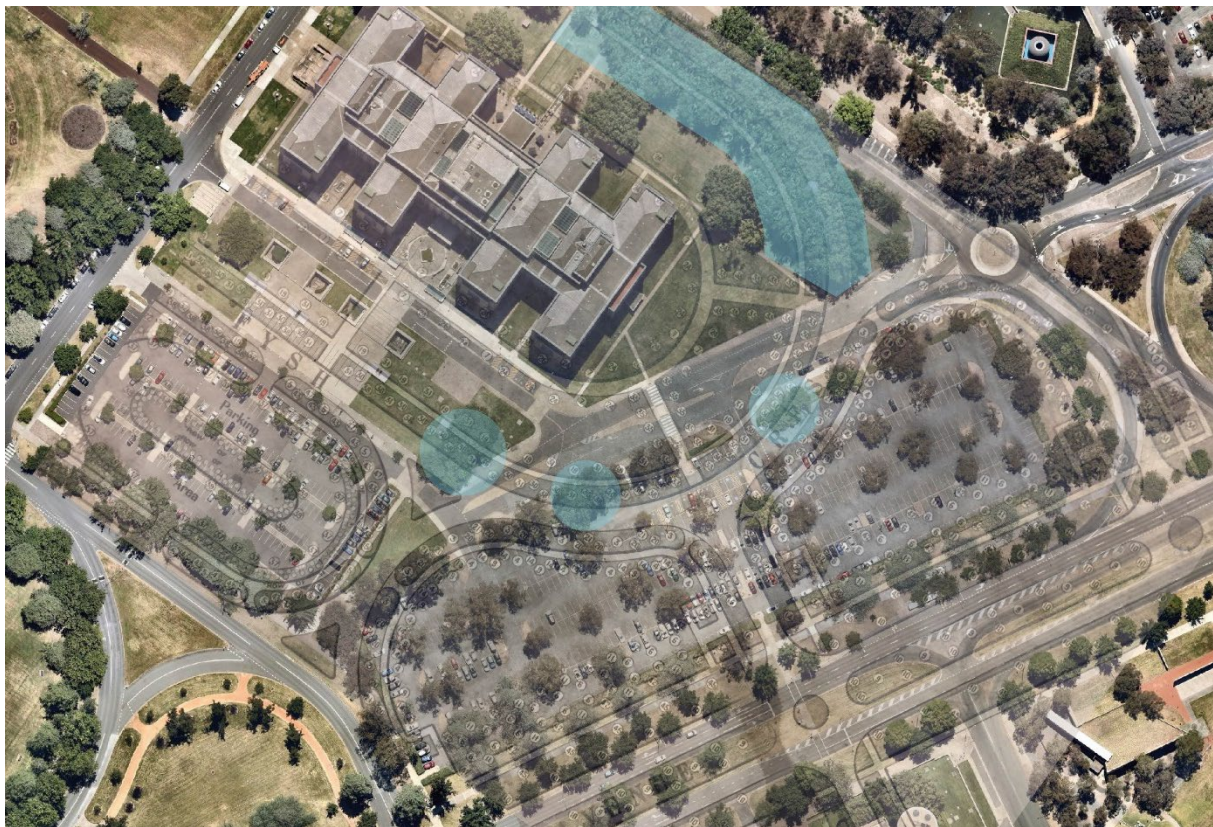


Figure B8 Detail of a 1928 plan showing the planting in the Parliamentary Zone, laid over a satellite image of the development area. The 1928 map marked the location of the trees with a number corresponding to the species. The existing trees that likely date from the 1920s are marked in blue and correspond to the circular planting pattern. (Source: National Library of Australia, Bib ID: 109644, Nearmap aerial and GML overlay)

Appendix C—Heritage Places, Values and Policies

Parliamentary Zone Context: Heritage Places, Values and Management Policies

This appendix summarises the heritage values of each place in, or relevant to, the Parliamentary Zone, for the proposed multistorey carpark adjacent to the John Gorton Building.

The information is summarised from the CHL or NHL citations or nominations and relevant policies excerpted from their relevant Heritage Managements (HMP).

John Gorton Building—Commonwealth Heritage Place

Heritage Values (summarised from the CHL citation)

- The John Gorton Building (also referred to as the Administrative Building) is significant as a good example of the inter-war Stripped Classical style.
- The John Gorton Building occupies a prominent and strategic location flanking the Land Axis within the Parliamentary triangle. Together with the Treasury Building balancing its mass across the central lawns of the land axis, the John Gorton Building contributes to the **planned aesthetic qualities** of the Parliamentary triangle cultural landscape.

Note: The citation utilises the term ‘Parliamentary triangle’. It is unclear if this is referring to the Parliamentary Zone (the area from Capital Hill to the southern foreshore of Lake Burley Griffin), the National Triangle (the area bounded by Commonwealth, Kings and Constitution Avenues), or a hybrid of the two.

Key Attributes (summarised from the CHL citation)

Key features of the building that display the Inter-war Stripped Classical style including:

- symmetrical façades;
- division of exterior façade into vertical bays;
- use of Classical details and basic Classical column form;
- expressed portico,
- simple surface treatments; and
- subdued spandrels between the storeys which emphasise verticality.
- Design elements that retain a high level of integrity including the exterior, foyers, lift lobbies and central corridors.

- Prominent and strategic location within the Parliamentary Zone, particularly the relationship to the Land Axis and the Treasury Building.

John Gorton Building Management Policies (from the HMP 2014–2015)

The John Gorton Building and Communications Centre HMP 2014–2015 provides the following specific management policies, summarised, and included here as relevant to the project:

Policy 7: Activities within and adjacent to the John Gorton Building should be low impact on fabric with heritage significance.

Explanatory text states that activities should not damage original and early fabric, with inappropriate activities including excavation works in close proximity to the building and development works adjacent which would cause vibration to the building.

Policy 8: Future planning adjacent to the John Gorton Building should maintain significant views and vistas such as show at Figure A.0.1.

Explanatory text explains the John Gorton Building is significant for its landmark attributes, and its association with the Parliamentary Zone. Current views and vistas to the building from the Treasury Building to the west, King Edward Terrace to the north along Edward Street should be retained.

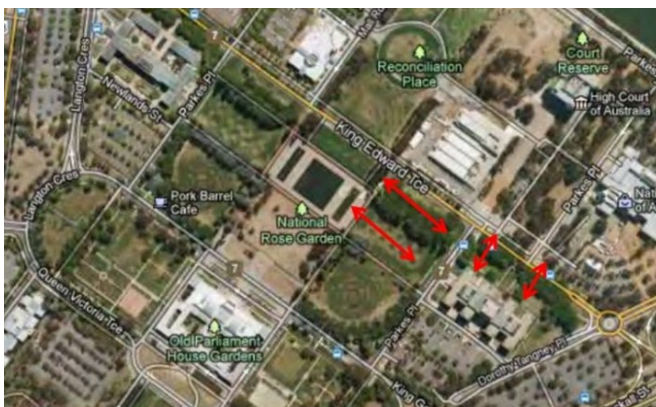


Figure A.0.1 Significant views and vistas as stated in the HMP. (Source: HMP 2014-2015)

Policy 9: Development adjacent to the John Gorton Building is not recommended. However, if there is no prudent or feasible alternative, new development should be considered within the development context of the significant area of the Parliamentary Zone.

Policy 35: Activities adjacent to the NCA managed elements [the grounds of the John Gorton Building] should be low impact.

Policy 36: Development adjacent to NCA managed elements of the John Gorton Building is not recommended, however if there is no prudent or feasible alternative, new development should be considered by the NCA and the Department of Finance within the development context of the heritage values of the elements and the significance area of the Parliamentary Zone.

Parliament House Vista (PHV)—Commonwealth Heritage Place

Heritage Values (summarised from the CHL citation)

- The Central National Area of Canberra is strongly associated with the history of politics and government in Australia and the development of Canberra as the National Capital.
- The Vista has high aesthetic significance due to the visual impact of the extensive open sweeping vista along the Land Axis that can be experienced in two directions, the designed Axes set within natural features of forested hills, patterns and textures of architectural massing accentuated by planned open spaces, water planes and tree plantings that are arranged across the area.
- The Vista is significant for its visual drama with its ability to engage viewers in the visual perspective of the sweeping vista to the terminal features.
- The Vista is highly significant for its symbolic representation of the democratic interchange between the people and their elected representatives and its use of the natural landforms to generate a strong planning geometry.
- The Parliament House Vista is the core of the most ambitious and most successful example of twentieth century urban planning in Australia.
- The area has strong and special associations with the broader Australian community because of its social values as a symbol of Australia and the Federal Government.

Key Attributes (summarised from the CHL citation)

- The concentration of buildings, parklands and gardens that support Commonwealth parliamentary and governmental activity as well as, to some extent, national cultural life.
- The extensive vista along the Land Axis, the forested hills, patterns and textures of architectural massing accentuated by planned open spaces, water features and tree plantings, artworks, the terminal features plus the interplay of scale and texture in the designed landscape.
- The whole Vista, including all elements and features contained within it, as well as the natural wooded hills beyond.
- Memorial features including sculptures, plaques, commemorative trees, water features and gardens.
- Recreational landscape spaces and gathering spaces in which the community may demonstrate.
- The whole of the vista, its planned layout, and the view from the Mount Ainslie which illustrates the realisation of Marion Mahony Griffin's perspective drawing for the competition].

PHV Management Policies (from the HMP 2010)

The Parliament House Vista Area HMP 2010 provides the specific management policies, summarised, and included here as relevant to the project:

Policy 16: General conservation provisions for the landscape.

The overall Parliament House Vista development area landscape character will be conserved as parkland with a balance of formal and informal elements. In particular:

- conserve the underlying geometry of the area, including the major boundaries of Kings and Commonwealth Avenues, and Parkes Way, as well as the Land and Water Axes, and cross axes in the Parliamentary Zone, reinforced by the lake, buildings, plantings, parklands, gardens and road system;
- conserve the treescape, including the avenues of trees;
- conserve the creation of recognisable character in specific areas, achieved through the careful selection of trees, shrubs and other materials;
- conserve the replacement of strict symmetry with a balanced development in the National Triangle, reinforced by the lake, buildings, plantings, parklands, gardens and road system, and conserve the stricter symmetry in the Land Axis corridor.

Policy 18: Tree maintenance and replacement

- The NCA will seek to conserve the treescape of the area and trees replaced as necessary. The design concept relevant to existing plantings will be maintained;
- The contrast in form and foliage, flowers and fruits provided by the mix of evergreen and deciduous species will be maintained.
- Trees within the area will be maintained, including periodic tree surgery as necessary.
- In the case of dead, dying or dangerous trees, those in poor health unlikely to recover, or those displaying such poor characteristics as to substantially detract from the landscape, such trees will be removed. Generally trees will be replaced with the same species, especially in the case of significant trees (eg. commemorative trees). In the case of trees which are part of group, every effort will be made to use an advanced specimen.
- In the case of replacement trees for significant trees, the NCA will consider:
 - consulting possible stakeholders before removal of the existing tree; and
 - the possibility of undertaking some ceremony associated with the replacement planting, depending on stakeholder views.
- Given that the initial spacing of some group plantings may have been too close to allow trees to develop fully, therefore selective removals could take place to allow remaining trees to develop fully. It will be recognized however, that this may not be possible with closely spaced conifers

Policy 28: Major buildings

Key qualities of the John Gorton Building to be conserved include:

- its siting;
- its external form; and
- use for government accommodation.

Policy 34: Roads

Generally, maintain existing roads unless otherwise noted. Changes may be undertaken, however, any adverse impact on heritage values will in all case be no greater than any existing

impact. The heritage values of road alignments which match the Griffin, Holford and National Capital Development Commission (NCDC) designs will be carefully considered in any proposal to change such roads.

Policy 35: Car and bus parking

Existing car and bus parking may be maintained, or removed, if possible. Parking will generally be screened from view, especially in the case of major vistas, and otherwise located outside of major vistas.

Policy 42: Protection of Setting

- The NCA will protect the setting of the Parliament House Vista to the extent possible within its powers. Beyond this, the NCA will encourage such protection for those areas which fall outside its responsibilities.

Policy 43: Protection of views to and from the area

The significant views to and from the vista will be protected. The significant views include:

- to the current Parliament House;
- from Commonwealth and Kings Avenues, especially the bridges.

Commentary from the HMP: This policy deals with external relationships and not specifically with views inside the area.

Policy 49: General provisions relating to new development:

- new permanent developments will not impact on the heritage values of the area not on important spatial relationships between individual buildings and open spaces (eg the relationship between the High Court and the National Gallery, or between the Gallery and Sculpture Garden);
 - new permanent development in the area will be part of a planned approach which is in keeping with the values of the area. Ad hoc development will be avoided;
 - developments will generally maintain public access to parklands and open spaces, and will not close off spaces;
 - new structures will not exceed the mature tree canopy in the vicinity or, in the case of the Parliamentary Zone, the RL of the height of the National Library, whichever is higher;
 - permanent structural or building intrusions to the Land Axis, Water Axis and the cross axes in the Parliamentary Zone (National Library—National Gallery of Australia and Treasury Building—John Gorton Building) will not be permitted;
 - permanent intrusions which block or substantially intrude into significance views/vistas will not be permitted—proposals should carefully consider any visual impact; and
 - consideration will be given to the impacts of new development on the values attributed to the development area and its components by specific and broader associated communities, as well as the impacts on existing institutions, government agencies, groups associated with specific sites (eg memorials), lessees and businesses, and other users and visitors to the development area. This will include consideration of construction-phase impacts.
-

Policy 50: New landscaping, landscape structures and plantings

- New landscaping, landscape structures and plantings, not including replacement plantings, may be permitted subject to the following:
 - that it is consistent with the general landscape conservation provisions and provisions relating to specific components (see Policies 16 and 17);
 - that it respects the existing tree planting patterns within the area; and
 - that it is consistent with any management plan for the specific component affected.

Policy 51: New major buildings

New major buildings may be permitted subject to the following:

- the provisions of the National Capital Plan including Appendix H regarding design and siting, and the master plan at Appendix T6 for the Parliamentary Zone;
- a comprehensive planned approach to the provision of major buildings within the area will be undertaken;
- building designs will be of high quality, either consistent for the overall area or consistent within major precincts, or designed in sympathy with other buildings in the immediate setting;
- with regard to design qualities:
- the style of buildings will pay due regard to adjacent buildings and the overall balanced development objective for the Parliament House Vista;
- maximum building heights will generally relate to the mature tree canopy of the area;
- predominant building materials and colours will generally draw on the palette of existing materials and colours used; and
- buildings should be predominantly oriented to the Land and Water Axes. That is, components of the building may depart from this orientation but the overall effect should match the axes.

Policy 54: New parking

New parking within the Parliament House Vista may be permitted provided that:

- generally, basement parking is to be provided in new buildings;
 - it is otherwise underground;
 - minor new surface parking may be provided as part of new building development; and
 - there is no nett encroachment into parkland areas in the case of new surface parking areas to replace existing areas, and new surface carparks will be screened.
-

Treasury Building—Nominated Commonwealth Heritage Place

Heritage Values (summarised from ERM HMP 2014)

The nominated heritage values are not available in the nominated CHL assessment.

- The Treasury Building has a strong association with the early planning of the national capital and plays an important role in the realising of the Griffin’s design vision [Griffin Plan] for the national capital.
- The building illustrates the growth of the Commonwealth Government since Federation and the importance of the role of Treasury in the administration of Australia and its economy.
- The Treasury Building is a significant example of the Late Twentieth Century Stripped Classical style of architecture in Australia with these architectural qualities valued by the wider community.
- The visual and physical relationship with the John Gorton Building opposite, and the planning and architectural role the Treasury Building plays in the Parliament House Vista are important aesthetic attributes.

Key Attributes (summarised from ERM HMP 2014)

The key attributes are not available in the nominated CHL assessment.

- Overall design and location within the National Triangle.
- Physical and visual relationship with the John Gorton Building.
- Elements that display Late Twentieth Century Stripped Classical style of architecture including: symmetrical façades, horizontal skyline, division of elevation into vertical bays, the use of the basic column form, expressed porticos, simple surface treatments including fine jointed dressed sandstone ashlar and polished granite blocks, anodised windows and subdued spandrels between the storeys which emphasise verticality.

Management Policies (from the Treasury Building HMP 2014 relevant to this proposal)

The Treasury Building HMP 2014 provides the following conservation policies relevant to the project:

Policy 8: Future planning adjacent to the Treasury Building site should maintain significant views and vistas such as those shown in **Figure A.0.2.**

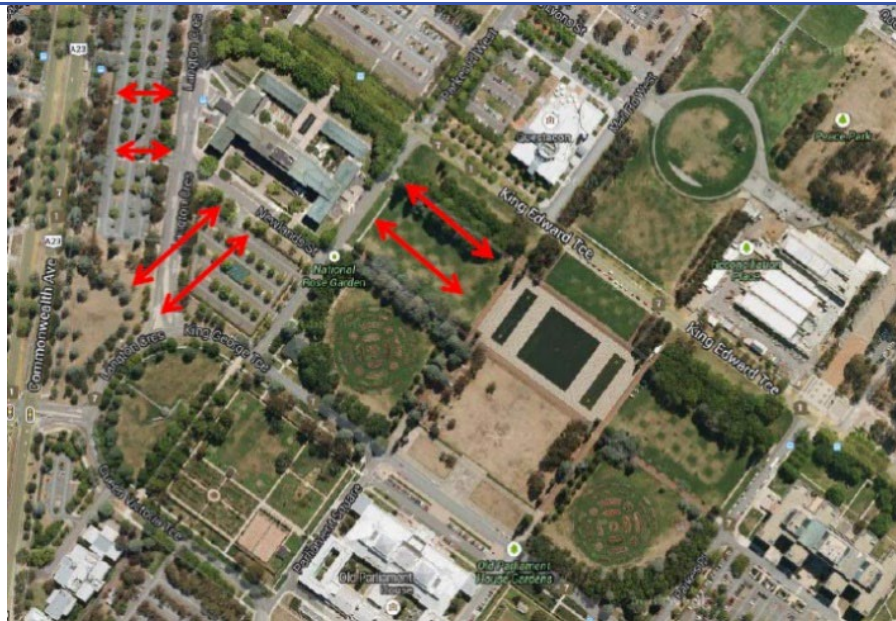


Figure A.0.2 Significant views and vistas. (Source: HMP 2014)

Edmund Barton Offices—Commonwealth Heritage Place

Heritage Values (summarised from the CHL citation)

- The Edmund Barton Offices is a highly acclaimed example of the Late Twentieth-Century International Style of architecture in Australia and the largest example in Canberra.
- The use of post-tensioned precast concrete and 'T' beams in the construction of the Edmund Barton Offices is now rare in Australia.
- Aesthetically, the building creates a strong, elegant presence along Kings Avenue, and with the strong horizontal patterns of the concrete I beams and windows contributes to the articulation of the Kings Avenue vista.
- The Edmund Barton Offices are significant for their technically innovative structural system employed with its precast post-tensioned 'T' floor beams, supported by precast post-tensioned I spandrel beams.
- The building was designed by Harry Seidler who is recognised as one of Australia's leading architects of the modern movement.

Key Attributes (summarised from the CHL citation)

- The innovative concrete structural system.
- Key features of the building that display the Inter-war Stripped Classical style including:
- quadrangular form with contrasting circular vertical access cores;
- the expression of the structural system;
- controlled use of architectural materials and detailing; and

-
- the use of plain wall surfaces devoid of superficial ornamentation.
 - Horizontal patterning of the I spandrel beams, extensive paved areas, features of monumental sculptures and ground level spaces that contribute to the aesthetics of the courtyards by providing a backdrop of horizontal framed views of street trees and the open ground floor exposing the structural system as an aesthetic feature.
-

Old Parliament House and Curtilage—National and Commonwealth Heritage Place

Heritage Values (summarised from the NHL and CHL citations)

Old Parliament House and Curtilage is listed on the CHL and the NHL. The following provides a summary of these heritage values.

- Old Parliament House (OPH) is significant as the first purpose-built home for the Australian Parliament. It was central to the development of Australia as a nation between 1927 and 1988 and demonstrates Australia’s parliamentary political process.
 - OPH is a place of outstanding heritage values related to its history, design, landscape context, interiors, furnishings, courtyards and gardens, collection of moveable items, social values and associations.
 - OPH is uncommon that it housed both the legislative and executive functions of government.
 - OPH is an important example of the Inter War Stripped Classical style of architecture. The essential character and symmetry of OPH has remained intact despite several substantial additions.
 - OPH is a central feature of a precinct, which includes East and West Blocks, the OPH Gardens, constitutional and Magna Carta Places and the National Rose Gardens. There is some commonality in the design style of the early buildings within the precinct, which reflects a period of increase in Commonwealth Government power and an increase in the public’s interest in Canberra.
 - OPH is an iconic national landmark that has a major role in the symbolic physical representation of democracy in the Parliamentary Triangle. Within Canberra, OPH is an important landmark and important component of the cultural landscape of the Parliamentary Triangle.
 - OPH demonstrates a high degree of achievement in combining built features into a designed landscape to achieve an aesthetic purpose. It is a major component of the designed landscape of the Parliamentary Triangle and the designed vista along the Land Axis.
 - OPH is socially significant both nationally and on a local level. Nationally it has been a strong symbol of Commonwealth Government in Australia, and of Canberra itself, for many generations of Australians. OPH is also directly associated with events that shaped the political and private lives of prominent individuals in Australia’s political and social history.
-

- As the home of the Commonwealth Parliament from 1927 to 1988, OPH is significant for its associations with Commonwealth governments, oppositions, political parties, individual politicians and the press.

Key Attributes (summarised from the NHL and CHL citations)

- The whole building, including all additions (design).
- Prominent siting on the Land Axis and within the landscape of the Parliamentary Triangle.
- The relationship between OPH and the areas around, particularly the Senate and House of Representatives Gardens and the National Rose Gardens.
- Inter-War Stripped Classical styling.
- Stark white colour and symmetry of the building.
- Its relatively plain yet dignified design.
- Views to and from the building, including towards the Australian War Memorial and Parliament House.
- The open landscape between the building and the lake.

OPH Management Policies from the HMP 2015-2020

The Old Parliament House and Curtilage HMP 2015-2020 provides the following conservation policies relevant to the project:

Policy 1.7 Protection of the Setting

1.7.1 The setting will be protected by:

- a. maintaining the relationship with the adjacent House of Representative Gardens and Senate Gardens;
- b. ensuring the Parliament House Vista is unimpeded by works on Old Parliament House;
- c. ensuring no additions or extensions are made to the external boundaries (elevations and roof) of the building and its curtilage; and
- d. conserving and protecting views to and from Old Parliament House.

Old Parliament House Gardens—Commonwealth Heritage Place

Heritage Values (summarised from the CHL citation)

- Old Parliament House Gardens are historically important for their associations with the operations of Parliament and links to parliamentary wives of the 1930s.
- Many existing rose specimens are regarded as fine aged species and the gardens is an important example of the international movement of landscape design.
- Old Parliament House Gardens contribute to the planned aesthetic qualities of the Parliamentary Triangle.

-
- The gardens are significant as an integral component of the OPH complex.
 - The gardens are associated with important figures of Parliament as well as Thomas Charles Weston and Robert Broinowski.

Key Attributes (summarised from the CHL citation)

- The roses, many of which were donations.
- The garden as a whole, including hedges, trees, garden beds and open lawned areas.
- Formal design layout.

OPH Gardens Management Policies

The Old Parliament House Gardens Precinct HMP 2015 provides the following conservation management policies relevant to the project:

Policy 35—Relationship to the broader landscape/Parliamentary Zone

Policy 35.1: The Conservation and management of, and any future actions in the Gardens Precinct will be carefully considered with regard to the important relationship with Parliamentary Zone and the Parliament House Vista conservation area.

Policy 35.2: Any proposals for the Parliamentary Zone should respect the significance of the Gardens Precinct.

Implementation Strategy

35.1 The surrounding road layout (but not necessarily the current fabric and form of the roads) will be conserved.

High Court and National Gallery Precinct—National and Commonwealth Heritage Place

Heritage Values (summarised from the NHL and CHL citations)

Old Parliament House and Curtilage is listed on the CHL and the NHL. The following provides a summary of the heritage values applicable to both these listings.

- The Precinct demonstrates the development of the Parliamentary Zone as the home for national institutions during a period in Australian cultural history when a search for national identity was stimulated by rapidly evolving political and social environment.
 - The Precinct is a rare example of an integrated design employing modernist building and landscape architecture on a scale and of a fineness of finish designed to project a sense of national importance.
 - The geometry of the expanding equilateral triangular design theme employed inside the Gallery and extending through the Sculpture Garden is a rare expression of multi-dimensional architectural geometry utilising the plastic capabilities of structural concrete.
 - The Precinct is a highly regarded expression of contemporary architectural and landscape design.
-

- The Precinct provides an array of aesthetic experiences derived from the patterns of the architectural masses, rough textures of the off-form concrete architectural elements, the vast spaces of the building entrances, the varied levels of the buildings and terraces and the intimate spaces of the garden.
- The Precinct is significant for its design achievement as a group of late twentieth century public buildings and landscape which were conceived by the same design team as a single entity, to create a venue for these important national civic institutions.
- The High Court and public landscaped areas of the Precinct are much used and valued by the community. The Sculpture Garden is valued by the community as an outdoor art gallery and as a freely accessible public area used by visitors and local people for musical, theatrical and other cultural and social events.

Key Attributes (summarised from the NHL and CHL citation)

- The entire complex, particularly the public areas of the High Court, the Gallery, the Sculpture Garden and the precinct landscape.
- The quality of the Precinct and particularly in the location and aspect of the High Court, which is separate from, but visually addresses, Parliament House.
- Features of the Precinct that express the triangular design theme.
- Designed plantings that demonstrate the Australian Native Landscape design.
- Late Twentieth-Century Brutalist style evident in the form, fabric and finish of the High Court, the High Court and National Gallery Prototype structures, the Ceremonial Ramp and Forecourt, plus all the structural elements.
- All the elements that contribute to the aesthetic experience.
- Views of the Precinct from the lake, views outward from the Precinct as well as several minor vistas and views within the Precinct.
- Colour hues of vegetation and the relationships of vegetation forms and water forms with structural features.

Management Policies

The draft High Court of Australia and National Gallery of Australia Precinct HMP, October 2020 does not provide any guidance on works occurring outside the boundary the Precinct.

National Rose Gardens—Commonwealth Heritage Place

Heritage Values (summarised from the CHL citation)

- The National Rose Gardens are historically significant as Australia’s first national gardening project and for their planning as a physical expression of the principle of cooperation between the Commonwealth and the States.
- The National Rose Gardens are a distinctive early example of twentieth century public garden design in the formal style.

-
- The location of the National Rose Gardens in front of the (then Provisional, now Old) Parliament House was planned to enhance the setting of Parliament.
 - The National Rose Gardens are valued by visitors and the local community for their aesthetic qualities.

Key Attributes (summarised from the CHL citation)

- The National Rose Gardens as a whole.
- Original and evolved design layout.
- Roses including diversity of species and aesthetic qualities.
- Size of the Gardens.
- Location, particularly relationship to Old Parliament House.
- Public accessibility.

Management Policies

The Parkes Place and the National Rose Gardens HMP 2013 provides the following conservation management policies relevant to the project:

Policy 38—Conserving significant relationships with the Setting

Parkes Place has a number of significant relationships with its setting which will be conserved, including the visual relationships with:

- Old Parliament House;
 - the Treasury Building;
 - John Gorton Building; and
 - the Land Axis, especially views to the Australian War Memorial and Mount Ainslie.
-

National Land Roads—Nominated Commonwealth Heritage Place

Heritage Values (from the NHL nomination for Kings Avenue)

- Kings Avenue is significant as an integral and major part of Walter Burley Griffin's 1911 plan for the national capital, and its realisation is associated with the evolution of the cultural landscape of the nation's capital.
 - Kings Avenue is one of the three major avenues defining the edges of the National Triangle and the initial design of the national capital is a highly significant part of Australia's and Canberra's history.
 - Kings Avenue is significant being relatively rare as an original and major part of Griffin's design representing one side of his planned National Triangle.
 - Kings Avenue helps to demonstrate the planning of a national capital which is an uncommon aspect of Australia's cultural history.
 - The cultural landscape of the national capital, including Kings Avenue, is significant from a research perspective in providing, through an examination of records and
-

landscape elements, information and an understanding of the capital’s cultural landscape.

- Kings Avenue is significant as a good example of an important type of landscape—wide tree-lined avenues—which are an important feature in Canberra’s planning and landscape.
- Kings Avenue is significant as a major part of a landscape/urban design that represents a paradigm shift in urban planning in Australia.
- Kings Avenue is an integral part of the designed national capital, acclaimed for its design excellence, which is of importance in the history of Australia and its capital city.
- Kings Avenue has special associations with Walter Burley Griffin and Charles Weston, both persons of importance in Australia’s cultural history.

Key Attributes (from the NHL nomination)

- Kings Avenue overall—**wide tree-lined avenue**.
- **Formality** in the design and aesthetic of Kings Avenue.
- The siting, alignment and width of Kings Avenue.
- **Plantings**—layout and mix of native and exotic species.
- Historical **function** as a major and active boulevard that facilitates public movement throughout Canberra.
- Views north and south along Kings Avenue.
- The **visual and spatial relationship** of Kings Avenue with Commonwealth and Constitution Avenues—the other two sides of the National Triangle.

Management Policies—Not available

No HMP has been prepared for the National Land Roads.

Canberra the Planned National Capital

As discussed at Section 2.3.2, ‘Canberra the Planned National Capital’ was assessed by the Australian Heritage Council as having heritage values which meet the National Heritage criteria of outstanding heritage value to the nation. However, the site was not included in the National Heritage List after other matters were considered. The heritage values identified by the Australian Heritage Council are relevant for this project.

The following information is a summary from the draft *Canberra, the Planned National Capital: National Heritage place EPBC Act Referral Guidelines* prepared by the Department of the Environment in 2012, which include the values and attributes identified by the Australian Heritage Council.

Heritage Values

- Canberra has outstanding heritage value to the nation because of the place's importance in the history of Australia's urban planning and Australia's evolving democracy
- Canberra has outstanding values to the nation because of the place's importance in exhibiting an ensemble of designed urban landscapes and settings that display and project its status, function and significance as the national capital. These features are valued highly by the Canberra and Australian communities for their aesthetic appeal.
- Canberra demonstrates a high degree of creative and technical achievement in town planning, urban design and urban horticulture. Its ensemble of planned city features demonstrating successive twentieth century urban design and planning approaches adds up to a showcase of outstanding value to the nation.
- Canberra the Planned National Capital has outstanding heritage values to the nation because of its special association with Australians as the nation's capital and seat of the federal democracy. Canberra also has a special association for Indigenous Australians as the place significant progress has been made towards Indigenous rights and reconciliation.
- Canberra has outstanding heritage values to the nation because of the place's special association with the lives and works of Prime Ministers and Governors-General of Australia as a group, and individual town planners Walter Burley Griffin and Marion Mahony Griffin.

Key Attributes

- Views from Mount Ainslie, Black Mountain, Red Hill and Mt Pleasant along the Land and Water axes.
- Views of national buildings in a parkland setting within the National Triangle, including those of the Parliament houses, the National Library, the High Court and the National Gallery of Australia.
- Layout of central Canberra, drawn from the Griffins' design, which includes grand axial vistas that align with the surrounding hills, the ornamental use of water, sweeping views towards distant mountain ranges and a mix of designed plantings and natural bush that together is appreciated as distinctively Australian.
- The Griffins' use of topography in the arrangement of the early city and its layout in accordance with its two principal axes—the Land and Water axes.
- The symbolic placement of the National Triangle to signify ideas about Australia, including the alignment of the National Triangle to topography and natural landscape features to signify the importance of the Australian landscape in the Australian identity.
- The symbolic placement of buildings and parks within the National Triangle to signify representative democracy.
- The use of geometry in the layout and organisation of the early city.
- The tree lined boulevards of King Edward and King George Terraces.
- The deliberate location of showcase buildings addressing the Land and Water axes.

-
- The use of architecture to create and reflect the dignity, status and function of the national capital within the National Triangle.
 - The location of the Administration Building (John Gorton Building) and the Treasury Building addressing each other across an open, flat, lawn.

Management Policies

As it is not included on the National Heritage List, an HMP has not been prepared for Canberra the Planned National Capital.

The Canberra the Planned National Capital: National Heritage place EPBC Act Referral Guidelines (draft), prepared by the Department of the Environment in 2012, noted that 'new development in the Parliamentary Zone' is likely to have a significant impact on the heritage values and that 'development proposals need to be designed to avoid significant impacts on National Heritage values'.
