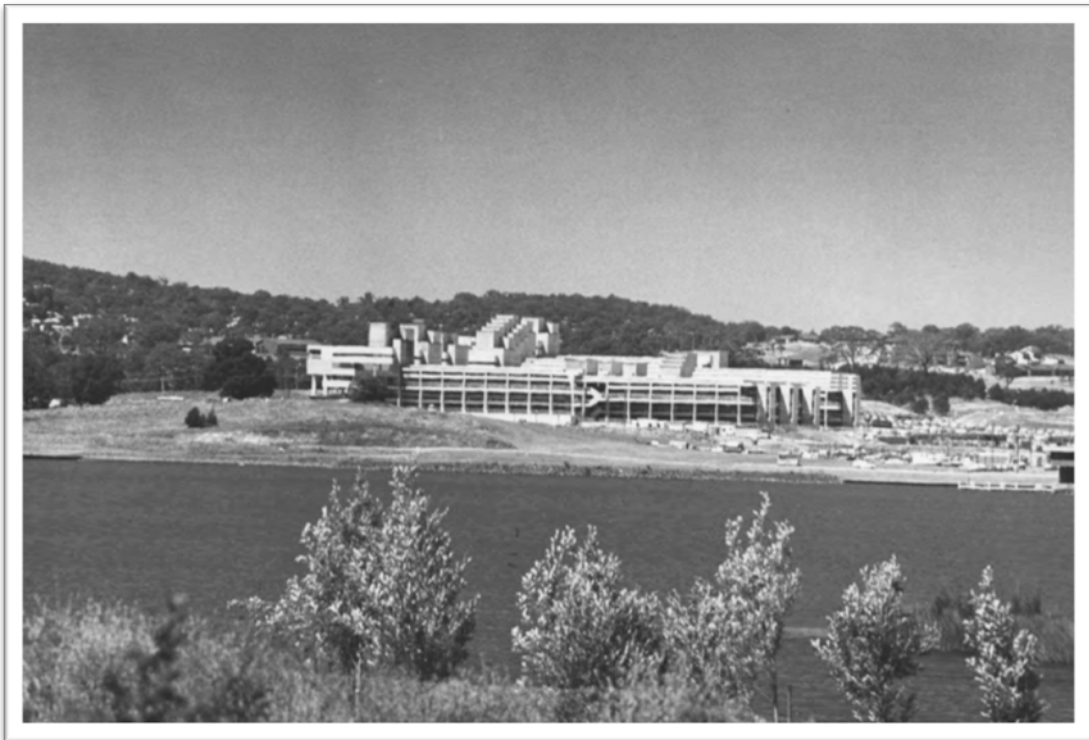


# CAMERON OFFICES

WINGS 3, 4 AND 5 AND BRIDGE

BLOCKS 7 AND 19, SECTION 44 BELCONNEN



*photograph: David Moore*

## STATEMENT OF HERITAGE IMPACT

**Proposed Erection of Two High-Rise Tower Buildings on  
Block 11, Section 44 Belconnen adjacent to Cameron Offices**

**MARCH 2018**

---

## CONTENTS

<b>Executive Summary</b> .....	<b>3</b>
<b>Introduction</b> .....	<b>4</b>
<b>Location</b> .....	<b>4</b>
<b>Object</b> .....	<b>5</b>
<b>Background</b> .....	<b>5</b>
<b>Heritage Status</b> .....	<b>7</b>
<b>Representativeness</b> .....	<b>8</b>
<b>Technical Achievement</b> .....	<b>8</b>
<b>Proposed Development</b> .....	<b>9</b>
<b>Relevant Heritage Legislation</b> .....	<b>11</b>
<b>Impact of Development of Block 11 on the identified Heritage Values of Cameron Offices</b> .....	<b>11</b>
<b>Prudent Approach</b> .....	<b>11</b>
<b>Historical Impacts</b> .....	<b>11</b>
<b>Historical Values</b> .....	<b>13</b>
<b>Summary</b> .....	<b>13</b>
<b>Overlooking Developments</b> .....	<b>14</b>
<b>Present Situation</b> .....	<b>14</b>
<b>Case Studies</b> .....	<b>14</b>
<b>Hotel Acton</b> .....	<b>15</b>
<b>Former Patent Office</b> .....	<b>16</b>
<b>Cameron Offices in a contemporary context.</b> .....	<b>18</b>
<b>Heritage Impact and the Development Control Plan</b> .....	<b>18</b>
<b>Conclusion</b> .....	<b>21</b>

---

## Executive Summary

*The remnant Cameron Offices are entered onto the Commonwealth Heritage List (Wings 3, 4 and 5 and Bridge).*

*Cameron Offices have official heritage values relating to:*

- its rarity as an uncommon example of a pedestrian linked flexible office complex expressed as free form structure in the Late Twentieth Century Brutalist style;*
- its representativeness as an example in Australia of elements of a major office building project designed in the Late Twentieth Century Brutalist Style. These features are demonstrated by the cubiform rectangular building form, the expressed structural frame, large sheets of north facing glass, the ribbon windows and plain smooth walls. strong shapes, boldly composed, expressed reinforced concrete and large off-form concrete, the reinforced concrete balustrades and precast concrete non loading bearing walls; and,*
- its technical achievements, displaying ingenuity and innovative use of material and orientation as a representative example of Australia's first and possibly only true example of architectural design where buildings are integral and contributing elements of an overall urban order rather than separate and individual elements*

*The Morris Group proposes to erect two 23 storey towers on a single three-storey podium (26 storeys in total) on Block 11 Section 44, approximately 34 metres from the rear of Wings 4 and 5 of the Cameron Offices.*

*An assessment of the official heritage values of the remnant Cameron Offices confirm that the values are expressed in the physical structure, its Brutalist style and materials palette and use of gallows beams, suspended floors and prefabricated concrete components.*

*None of the values are impacted on, adversely or otherwise, by the Morris Group proposals.*

*The Statement examines the potential for adverse effects on the place (other than effects on the official heritage values) by being in close association with larger contemporary buildings, particularly multi storey tower blocks.*

*Two case studies are provided focussing on Hotel Acton and the former Patent Office, both of which are on the Commonwealth Heritage List. Similarities are noted with respect to the low rise of buildings identified in the studies, their relationship to adjacent buildings and restrained architecture.*

*The Statement notes that the buildings in the studies were originally considered more physically substantial because of the lack of development in the city between 1924 and 1955. Over time, the intrusion of more modern and larger buildings into what was previously an exclusive precinct, has changed the scale of each building in relation to its physical context, but because of the innate robustness of each building, there has been no adverse impact on its heritage values.*

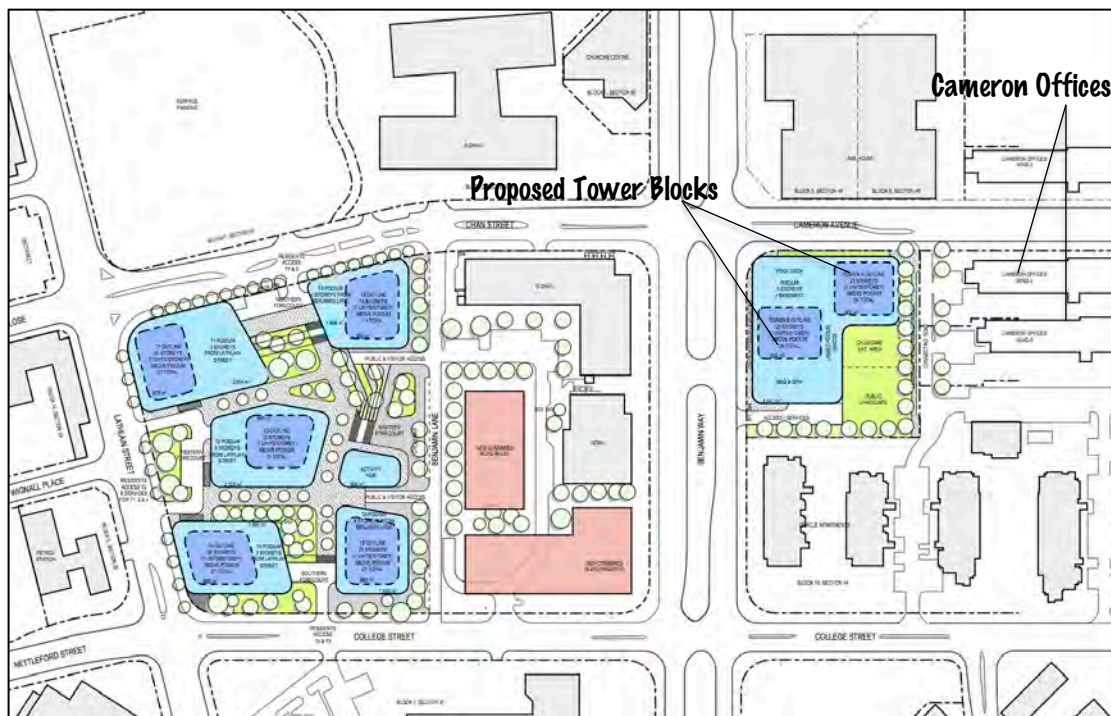
*Finally, the Statement notes the need to bring the disparate blocks together and create a unified precinct within Section 44. This can be achieved by a precinct master plan based on the present road and pedestrian path layout to connect five clusters of buildings through a common vehicle and pedestrian system and a common landscape design.*

## Introduction

1. The Statement of Heritage Impact set out below relates to a proposal to erect two residential towers on Block 11 Section 44 Belconnen, immediately to the west of Wings 4 and 5<sup>1</sup> of the remnant Cameron Offices (*“the place”*).
2. Each proposed tower will contain 23 storeys mounted on a common three storey podium. In contrast, Wings 4 and 5 of the Cameron Offices are three storey buildings with a partly exposed basement being visible from the west.
3. Wings 4 and 5 Cameron Offices are situated on Blocks 7 and 19 Section 44 Belconnen, directly to the east of Block 11. Wings 3, 4, and 5 and the Cameron Avenue Bridge are entered into the Commonwealth Heritage List, and are subject to the provisions of the *Environment Protection and Biodiversity Conservation Act 1999* (Commonwealth).

## Location

4. The proposed development is located on Block 11 Section 44 Belconnen. The land addresses Benjamin Way to the west and Cameron Avenue to north. To the east the land abuts Block 19 Section 44 Belconnen, on which is erected Blocks 4 and 5 of Cameron Offices. To the south the land abuts Block 10 Section 44, on which are erected the two seven storey residential buildings (the Oracle Apartments). A pedestrian walkway separates Block 11 from Blocks 7 and 19 (*see Figure 1 below*).



**Figure 1. Proposed location of tower buildings on Block 11 Section 44**

<sup>1</sup> In this Statement 'Wing' means the structure comprising Block A: (the pedestrian mall and entrance tower), Block B, the office area closest to the entrance tower, Block C the office area furthest from the entrance tower and beyond the central tower.

Heritage Impact Assessment  
Cameron Offices  
Blocks 7 & 19 Section 44 Belconnen  
March 2018  
Version 1.1

---

## Object

5. *The object of this assessment is to determine the impact of the proposed development of Block 11 Section 44 Belconnen on the heritage values of the remnant Cameron Offices.*

## Background

6. The original Cameron Offices were designed by architect John Andrews AOM, for the National Capital Development Commission (NCDC) and built by T.C. Whittle, a Sydney builder, (who had had no previous experience with a project of this complexity and nature) between 1970 and 1977, at a cost of \$44.3m including additional roofing for six buildings. The original design comprised of eight blocks connected by an elevated pedestrian mall and a bridge over Cameron Avenue. A ninth block (not designed by Andrews) was added in the southeastern corner of the complex to provide premises for a proposed supermarket, but was never occupied for this purpose. The complex also included the District Thermal Station to the north of Wing 1.

7. The original NCDC design brief sought an office complex to house 3000 workers at 210 square feet per person in three towers of at least 15 storeys in height *“20-22 storeys acceptable – indeed desirable”*. The office complex was to form an integral part of the Town Centre core area marking its southern boundary and providing a link between the core area (at that time located to the north of the Cameron Office site) and the housing development on Emu Ridge.

8. John Andrews rejected the high-rise model in favour of a low level complex with very high permeability. The critical elements were the north/south pedestrian mall linking Emu Ridge to the town centre; the east west orientation of the office wings permitting pedestrian movement through the complex from Benjamin Way to Chandler Street using a series of bridges connected to the pedestrian mall, and the half floor rises within the wings intended to provide a low energy movement system for Cameron offices workers. Andrews saw the office complex as the conduit for bringing housing, offices, transportation, parking, shopping and community activities together.

9. Cameron Offices were designed as a large open plan office complex based on a work module 45m x 15m (approximately) utilising a connected slab model and half level floors to contribute to maximum flexibility in pedestrian movement between levels within buildings (interdepartmental routes), but which also featured address routes from the mall into the buildings and courtyards, and open air landscape routes.

10. In 1974, the Federal Minister Tom Uren, at the behest of the Canberra Commercial Development Authority, agreed to the main retail centre (Belconnen Mall) being moved from the northern end of Emu Ridge to level ground to the west of Benjamin Way. The relocation of the town centre to land west of Benjamin Way, instead of the ridge north of Cameron Offices as intended by the NCDC, destroyed Andrew’s original intention of making the office complex a pivot point for Belconnen activity. The Cameron Offices pedestrian mall was never connected to the residential area to the south, and the attenuated pedestrian link to the town centre – over the bus interchange – drew pedestrian movement away from the Cameron Offices pedestrian mall, leaving it with the much-diminished function providing access for workers and interconnecting the Office wings.

11. The original, and only Australian Government tenant, the Australian Bureau of Statistics (ABS) set out to be a model tenant, producing a booklet for its staff explaining the nature of the building and its operation. It produced a sectioned model of a wing, to explain the half floor rises that were intended to make moving from one level to another quick and relatively effortless.

12. Innately, and despite its initial goodwill towards the complex, the ABS was the wrong tenant for the building. The ABS requires a high level of security to properly carry out its functions and the

---

level of permeability envisaged by Andrews for the complex was anathematic to the Bureau. The Bureau closed all east/west pedestrian paths to other than authorised users, and the planned bridges over Chandler Street were never constructed, although the ports remain in the balustrade of the remnant pedestrian mall.

13. While Cameron Offices continued to serve its function as a large office complex until 2006, the lack of connection of the pedestrian mall to the Emu Ridge residential areas and the Town Centre doomed any potential to achieve its designer's objectives for making the complex pivotal to the town centre's retail, social, recreational, and commercial activities. Wing 9 never served its intended function of a supermarket, and the commercial potential of the generous spaces available at each level of the pedestrian mall was lost because there was no connection to sources of pedestrian traffic envisaged by Andrews.

14. *Optical Galaxy* is a concrete and acrylic sculpture by Canadian sculptor Gerald Gladstone formed part of the initial development. It was erected in the mall opposite Block 9. Although *Optical Galaxy* has survived the demolition of the pedestrian mall and Blocks 6-8, its history typifies the lack of understanding of the Cameron Offices by the occupants of the complex and those charged with its care and maintenance. The significance of the acrylic boxes atop each fin was never understood or appreciated, nor was it realized that water needed to flow over the fins constantly, both for artistic effect, and to flush away algae that form on the concrete surfaces and the Lucite boxes capping the fins.



*Photograph Max Dupain*

***Photograph One. "Optical Galaxy" on the pedestrian mall opposite Wing 9. In strong winds water blown from the sculpture would flood the walkway.***

---

15. Similarly, the removal of the rooftop gardens in 1987 and the deterioration of the courtyard landscapes through inadequate maintenance and a lack of understanding and appreciation of landscape design attests to a regime that did not or was not able to treat the buildings properly.

16. The ABS remained as tenants until (?) when the Bureau moved to new premises on the corner of Benjamin Way and Cameron Avenue. There being no commercial tenants available for the now 30 year old offices, the owners, Cameron Nominees, decided to demolish them. Prior to demolition, the original architect, John Andrews was engaged, in conjunction with May+Russell Architects, to determine if it were possible to redevelop the complex as an office/apartment mix “consistent with contemporary standards and market preferences”.

17. When the contributing consultants advised Cameron Nominees that there was no viable scheme for meeting the objective of converting the complex to office/apartments, the lessees demolished Blocks 1, 2, 6, 7, 8 and 9, and the District Thermal Station.

### **Heritage Status**

18. Cameron Offices (Wings 3, 4, and 5 and Bridge) Chandler Street Belconnen are entered into the Commonwealth Heritage List as an historic place. The place details are at Annex A.

19. The official values are grouped under:

- Rarity (R.10.03A(2)(b))
- Representative Values (R10.03A(2)(d))
- Technical Achievement (R.10.03A(2)(f))

20. The alphabetic criterion system used in the Place Details is not use in the Environment Protection and Biodiversity Conservation Regulations.

21. These values are discussed below.

22. Blocks 10 and 11 Section 44 have no heritage status. Accordingly it is unnecessary to consider any potential heritage impact on these parcels of land.

### **Rarity**

23. Blocks 3-5 represent a building technology no longer practiced. This is dealt with under ‘Technical Achievement’ below. Cameron Offices represent:

- a. *“an uncommon example of a pedestrian linked flexible office complex expressed as free form structure in the Late Twentieth Century Brutalist style. It reflects and emphasises its sloping site and provides evidence of the pedestrian link.*
- b. *...(it) is a rare example of an office building planned system on a stepped horizontal communication system rather than the more common vertical communication system of high rise offices.’*
- c. *The Commonwealth Heritage value is expressed in the structures and associated spaces of Wings 3, 4 and 5, the Bridge and the streetscape setting.”*

---

## Representativeness

24. The *Place* details state that:

*“...(It) is a representative example in Australia of elements of a major office building project designed in the Late Twentieth Century Brutalist Style. These features are demonstrated by the cubiform rectangular building form, the expressed structural frame, large sheets of north facing glass, the ribbon windows and plain smooth walls, strong shapes, boldly composed, expressed reinforced concrete and large off-form concrete, the reinforced concrete balustrades and precast concrete non-load bearing walls. The building design recognises energy efficient principles having the wings orientated east-west to take advantage of northern sun, not achievable in high rise offices.*

*The low rise rectangular form of the Wings with an intervening courtyard demonstrate a style of office accommodation that integrates office complexes, housing and commercial complexes and landscaped gardens. The stylistic value is strong and the public visibility of the building is high.*

*The Commonwealth Heritage value is expressed in Wings 3, 4 and 5 and the Bridge and all the features noted above.”*

25. In *A Pictorial Guide to Australian Architecture*, Apperly, Irving and Reynolds<sup>2</sup> note that:

*“...The typical Brutalist building was (or seemed) large, tough and rather overpowering, with blocky shapes jostling each other aggressively. The favoured material both outside and inside was reinforced concrete bearing the imprint of its formwork. ....Services were proudly exposed and it was no longer denigratory to say that a building “looked like a factory”<sup>3</sup>...”*

26. Cameron Offices is cited as an exemplar of the Brutalist style, “*having an aggressive largeness of scale*” (p.255).

## Technical Achievement

27. The *Place Details* states that:

*“...(It) display(s) ingenuity and innovative use of material and orientation as a representative example of Australia’s first and possibly only true example of architectural design where buildings are integral and contributing elements of an overall urban order rather than separate and individual elements. Although the town plan of Belconnen was later altered during construction of the complex, Wings 3, 4 and 5 still exhibit this style.*

*Cameron Offices was regarded as the first example of an office building in Australia where the designer has given an architectural expression to the nature of the topography, enhancing the then urban skyline of Belconnen, emphasising the views from the ridge, and*

---

<sup>2</sup> Apperly R, Irving R and Reynolds P

*A Pictorial guide to Identifying Australian Architecture Styles and Terms for 1788 to the Present* Angus & Robertson (1994)



---

*stepping each wing down the slope to create a terracing effect. Wings 3, 4, and 5 represent this terracing effect.*

*Wings 3, 4 and 5 and the Bridge provide efficient and economical use of materials, create column free office spaces with clear spans of 17 metres, with summer sun shading to the north facing offices in a pleasing rhythmical architectural expression. This complex yet logical structural system created by using 17 metres long pre-cast "T" beams, individual staggered hanging columns and large gallows beams supported by full height columns.*

*The extensive use of post-tensioned onsite precast concrete for much of the structure was a relatively new and innovative building system, utilised in many later office buildings. The use of post-tensioned precast concrete 'T' floor beams, which was prevalent in the late 1960s to mid 1970s is now rare in Australia.*

*Other innovative design features are the pedestrian street concept with a horizontal walkup form and integration of structure, landscape and services into a unified whole, concepts that established a design philosophy for office buildings which influenced later Canberra's planners. Wings 3, 4, and 5 and the Bridge contribute to the streetscape and central Belconnen townscape with its stepped arrangement of rectangular forms and voids along Chandler Street and Cameron Avenue. Wings 3, 4 and 5 express strong sculptural massing which contributes to the skyline, a feature for which Cameron Offices was noted,*

*The Commonwealth Heritage Value is expressed in the off form concrete structural structures (sic) including the office spaces courtyard, bridge, pedestrian walks and their fabric and finishes."*

28. Although the representative values refer to the:

*"...the low rise rectangular form of the Wings with an intervening courtyard demonstrating a style of office accommodation that integrates office complexes, housing and commercial complexes and landscaped gardens. The stylistic value is strong and the public visibility of the building is high..."*,

there is no reference to the scale of the *place* within the context of the surrounding townscape. The Brutalist form does not rely on a landscape setting, instead it uses strong shapes, and bold composition to express itself. However, Cameron Offices was recognised, *inter alia*, for its "aggressive largeness of scale" (see footnote 2 above), but this characteristic relied on the scale of surrounding developments being subordinate to that of the Cameron Offices.

29. The 'aggressive largeness' of the original development disappeared, firstly with the demolition of Wings 1, 6, 7, 8 and 9, then with the erection nearby of large office blocks not envisaged in the early Belconnen Town Centre master plans.

### **Proposed Development**

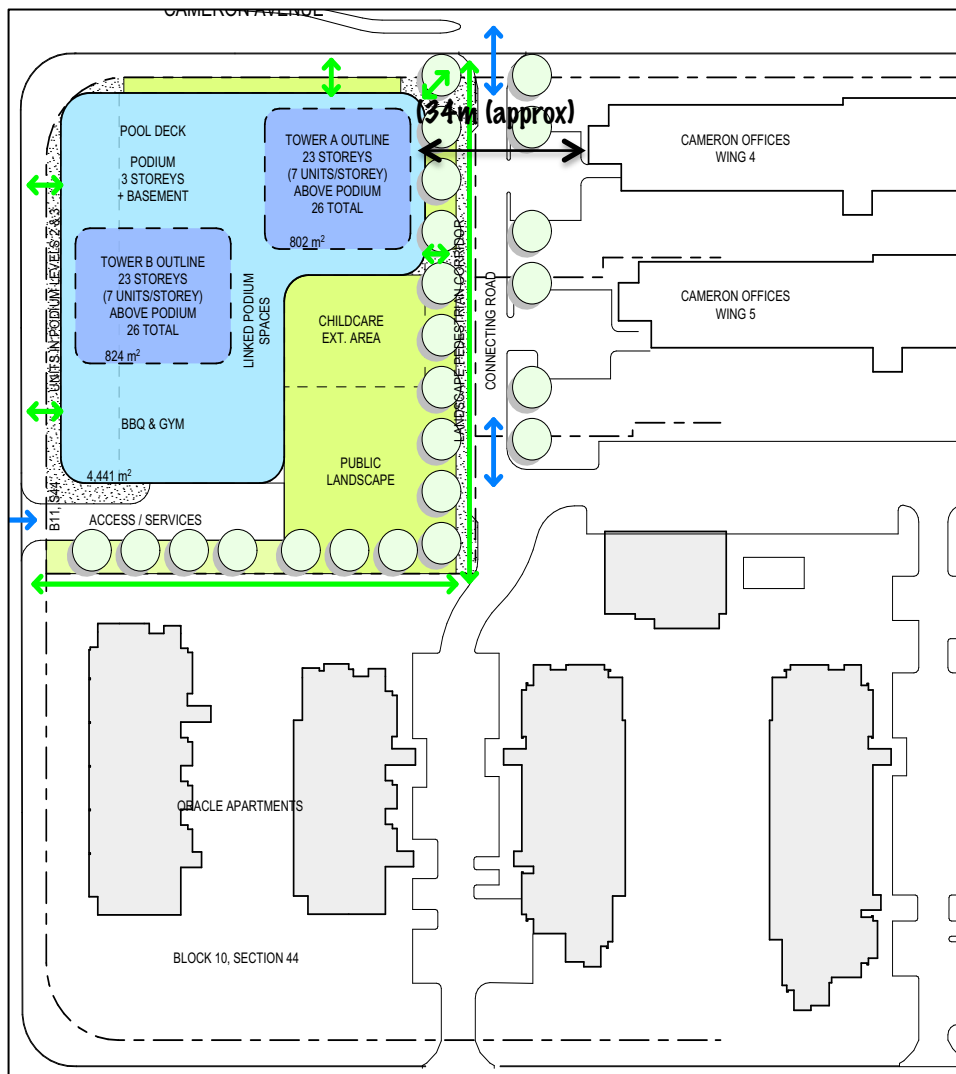
30. The proposed development on Block 11 Section 44 would comprise of two towers mounted on a common podium within a square block having frontage to Benjamin Way to the west, Cameron Avenue to the north, Block 10 (Oracle) to the south, and abutting Block 19 Section 44, (Cameron Offices) to the east.

31. The tower blocks (A and B) each have a proposed height of 23 storeys above a common podium of three storeys, giving the complex an overall height of 26 storeys.

32. Block 11 Section 44 Belconnen has an area of 8346 square metres. The podium for the two towers will have a site coverage of approximately 4441 square metres or 53 % of the site. The podium will be set back approximately 13.5 metres from the common boundary, and if benched into land, will be level with or slightly lower than the ground floor level of Wing 4 and lower than the ground floor level of Wing 5.

33. Wing 4 is approximately 26 metres horizontally from the common boundary of Blocks 11 and 19 and the nearest point of the podium approximately 34 metres from the nearest point of Wing 4. Cameron Offices have an existing height of 614m AHD. T8 would have an approximate height of metres or AHD - (?) metres taller than Cameron Offices.

34. Approximately 47% of Block 11 would be landscaped space and circulation. The landscaped space has a potential to be connected to Blocks 10 and 20, providing the permeability originally envisaged for Cameron Offices. At present Blocks 10 and 20 are fenced off, but Development Control Plan 171/08/0003 provides for a pedestrian corridor between College Street and Cameron Avenue that will link all four blocks within the Cameron Avenue/Chandler Street/College Street/Benjamin Way precinct.



**Figure 2. Interface of proposed towers on Block 11 with Cameron Offices, Wings 4 and 5. Three groups of two seven storey apartment blocks (two groups shown) set perpendicular to College Street provide a hard edge to Cameron Offices (See Photograph Eight below)**

---

## Relevant Heritage Legislation

35. The *Environment Planning and Biodiversity Conservation Act 1999* ('the EPBCA'), Division 3 provides for the entry of certain places into the Commonwealth Heritage List ('the CHL'). Cameron Offices were entered onto the Commonwealth Heritage List on 22 August 2005 (Place ID 105410). Entry into the list requires the place to have Commonwealth Heritage values as prescribed by regulation (s341D). The relevant heritage values are set out in the citation at Annex A and recited at paragraphs 18-25 (above).

36. Clause 341ZE provides for the protection of the heritage values of places leased or sold by the Commonwealth. Pursuant to Clause 341ZE (5), Campbell Dion Pty Ltd, on behalf of Cameron Nominees, prepared a Conservation Management Plan for the remnant Cameron Offices and Bridge (see Place Details: Bibliography). The original conservation management plan contemplated policies for the entire complex, however, the Conservation Management Plan (Part 2) was tailored to the specific needs of the remnant Cameron Offices and Bridge.

## Impact of Development of Block 11 on the identified Heritage Values of Cameron Offices

### Prudent Approach

37. The official values of Cameron Offices are set out in paragraphs 23-25 (*above*). The values relate to the architecture, structural engineering, and urban design elements of the place.

38. An inspection of the place indicates that all of the elements comprising the official heritage values remain in place and are of a condition consistent with their age and ongoing use.

39. Wing 3 remains in use as a conventional office block. Wings 4 and 5 have been adapted for accommodation for students of the University of Canberra. Light metal stud framing was used for partitioning the open plan floors to create units for sleeping accommodation and study. Similar partitioning was erected to create common areas and facilities normally forming part of student residential buildings. Penetrations of the floors were made for service and a staircase was added for more convenient access between floors.

40. While the partitioning prevents any appreciation of the open plan office system that previously distinguished the wings, all of the structural elements of the building remain clearly identifiable and available for interpretive study. The robust nature of the building elements, and their interdependency has ensured that the designer's original intention for the built form has endured in the transition to the complex's contemporary function.

### Historical Impacts

41. NCDC documents suggest the sprawling nature and high permeability of the Cameron Office complex was redolent of the university campus projects Andrews completed in the United States, Canada and Australia (Harvard, Kent State, Scarborough, (Toronto), Guelph, RMIT). Blocks 10 and 11 Belconnen were designed to provide at-grade parking *at the rear* of Cameron Offices, for what, at the time, was essentially a car-orientated city.

42. The open space created by the two blocks was not intended to emphasise the Brutalist style of architecture employed in the building's design, nor was it considered as a part of the essential landscape context of the complex (see below).

43. The Brutalist style was, and remains, most evident in the Chandler Street elevation of the complex where the elevated pedestrian mall and its dramatic articulation dominated the streetscape

---

and the view from the road. From Cameron Avenue and College Street only oblique views were available of the wings because of the minimal setbacks of Wings 3, 4 and 8 from the street, and because of the extension of the gallows beams and elevated walkways beyond the face of the buildings.

44. In Photograph Two (below), the essential elements of John Andrew's Brutalist design are clearly evident, i.e.,

- the strong shapes,
- pronounced articulation,
- Corbusian windows,
- off- form concrete finish,
- lengthily, aggressively expressed concrete balustrades.



*Photograph Max Dupain*

***Photograph Two. Chandler Street address to Cameron Offices. Bridge over Cameron Avenue at far right. Executive suites and function areas for Wings 4,5 and 6 visible over pedestrian mall***

45. In contrast to the detail displayed in the Chandler Street elevation, and in wings with their expressed structural elements, the west, or rear elevations, appear almost as a design afterthought. The low-rise 'C' towers presented a blank face to the west, with articulation provided by the long galleries between the wings.

46. The original car park to the west (Blocks 10 and 11) was divided into rectilinear areas with each area orientated to an adjacent wing. A landscaped corridor aligned to the adjacent courtyard defined each parking area, and movement from car to workplace was organised along these corridors and into the pedestrian system running through the buildings.

---

47. No evidence is provided in any of the NDC documents utilised in the preparation of the Conservation Management Plan that would indicate a design intention for the open space to the west of Cameron Offices to stress, enhance or emphasise the Brutalist style of the buildings. A report prepared by Conybeare Morrison and Partners (Conybeare) , for the Department of Finance and Administration (1998) discusses the landscape almost entirely in terms of the courtyards and makes no reference to any landscape values attributed to the car parks to the west of the complex.(75) <sup>4</sup>



***Photograph Three. Western end of Wings 4 and 5 viewed from Block 11 Section 44. The galley beams and columns over the former Courtyard Four.***

48. Conybeare , in their Statement of Significance, grade Cameron Office elements in terms of importance from high importance to little importance. Although the courtyards are rated as being of high importance, the car parks are ignored in terms of heritage significance (60).

49. The function of Block 11 was entirely utilitarian, it was a car park for a large car-orientated work force. Cameron Offices relied on its own bulk, massing, form and texture to make its architectural statement, and drew nothing from the car park to its rear.

### **Historical Values**

50. There were no historical values embodied in the car parks on Blocks 10 and 11 Section 44. They contributed nothing to the appreciation of Cameron Offices as a Brutalist style building, nor were they intended to provide any reference points to assessing the scale of the complex. Their simple function was to provide an organised place to leave a commuter vehicle and a system to channel workers/drivers onto pathways that provided quick and convenient access to their workplaces.

### **Summary**

51. *The official heritage values of Cameron Offices refer to the physical structure of the building. They relate to its form, style and structure. In addition to these physical qualities, the remnant building retains all the marks of its Brutalist origins, and internally an intangible sense of place,*

---

<sup>4</sup> Conybeare Morrison and Partners *Cameron Offices . Belconnen Canberra* (August 1998) p.45  
Heritage Impact Assessment  
Cameron Offices  
Blocks 7 & 19 Section 44 Belconnen  
March 2018  
Version 1.1

---

*somewhat akin to immersion art. None of these qualities are diminished in any way by external factors. In essence, the robust nature of the construction, the visual impact of the galley beams, and the internal and external spaces dictated by the precast elements devised and used by the architect provide protection against any diminution of the buildings' heritage values.*

### **Overlooking Developments**

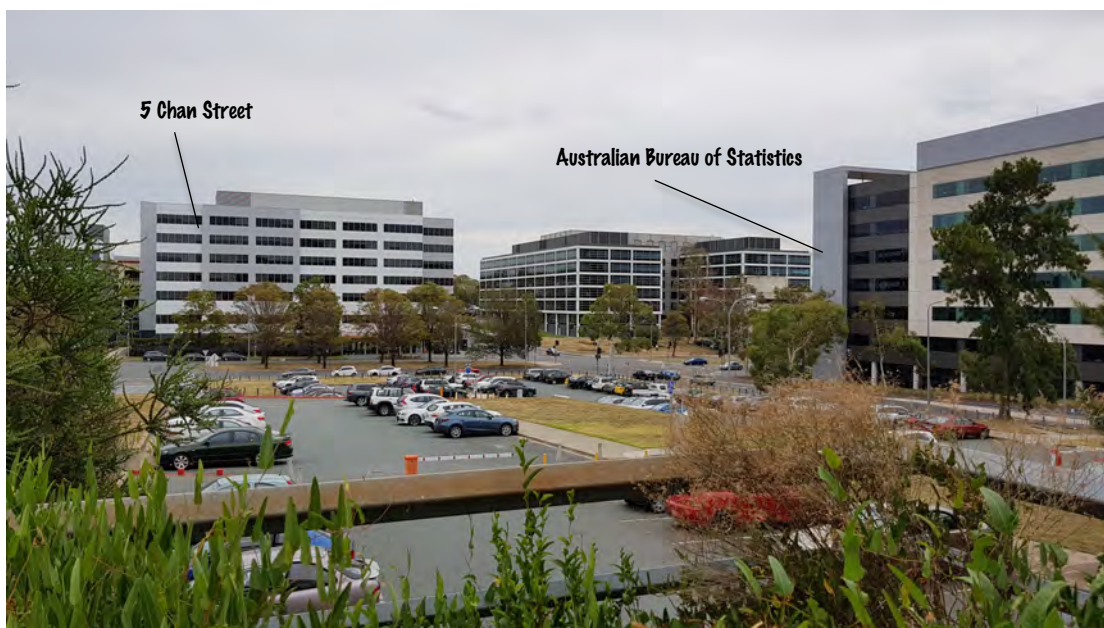
52. There remains concern that, notwithstanding there is no identifiable threat to the official heritage values of Cameron Offices by removing the surface level car parks, the Offices may be adversely affected by the close interface of the western elevation of the complex with a proposed group of buildings some 23 storeys higher (depending on how Block 11 is benched out to provide a platform for the high rise towers).

### **Present Situation**

53. Block 11 Section 44 forms a hollow square, with a hard edge provided by Block 5 Section 49 to the north; Block 3 Section 43 to the west; Block 10 Section 44 to the south; and, Cameron Offices (Blocks 7 and 19) to the east. The block falls approximately 5m(?) from east to west.

54. Block 11 is presently divided into a public car park with metered parking and a gated park for pass holders east of the Cameron Avenue entrance.

55. A seven storey building occupied by the Australian Bureau of Statistics is situated on Block 5 Section 49.



**Photograph Four.** *Block 11 from Wing 5. Seven storey buildings on Benjamin Way (middle of photograph) and Cameron Avenue (right) presently provide a hard edge to Block 11.*

### **Case Studies**

56. Two case studies (below) are provided to assess the impact of contemporary medium to high rise development on two low rise buildings on the Commonwealth Heritage List. Hotel Acton (now called "Peppers") was built in 1927 as a hostel for Departmental staff, and the former Patent Office ('the Patent Office') was purpose built in 1942 for that organisation.

---

57. The podium for the proposed towers on Block 11 Section 44 will be set back approximately 34 metres from the nearest point of the rear face of Wing 4. A similar situation exists with the relationship between the Hotel Acton (Commonwealth Heritage List) and the Nishi Building, and between the former Patent Office and two unnamed buildings to the east.

### Hotel Acton



***Photograph Five. Relationship between the Hotel Acton and the Nishi Building. The Nishi Building is approximately 92m long. The South Acton Tower is visible on the far left.***

58. The Hotel Acton is a two storey, rendered brick building with a Marseilles tiled hip roof constructed by the Federal Capital Commission in 1927. It is relatively intact, although the MacIntosh Room (to the left behind the tall tree) was reconstructed after being destroyed by fire. At the time of its construction it stood in isolation, some distance north of the Molonglo River, and to the west of what would become City Hill. Although the land surrounding the Hotel is now entirely built up, it retains its essential character and its heritage values are undiminished.

59. The Hotel Acton has its main address to Edinburgh Avenue and lies within a hollow square bounded by the Nishi Building to the west; NewActon to the east; and South NewActon to the south. From a heritage interpretation viewpoint, the surrounding development emphasises the almost domestic style and scale of the architecture. The Nishi Building is 55m high and has 17 storeys. It has an imposing and highly detailing facade and a frontage of 92m to Phillip Law Street.

60. Hotel Acton was subjected to some minor adaptation in order that it could perform in its new role as a boutique hotel, but the original eight wing layout is unaltered. As with Cameron Offices, Hotel Acton asserts itself robustly and, if anything, ignores the buildings around it.

---

## Former Patent Office



*Photograph Six. The former Patent Office (now the Robert Marsden Hope Offices) stands in its own landscape setting with a six-storey office block providing a backdrop to the south.*

61. The Patent Office is a two-storey steel framed building with block-work curtain walls and Gosford Sandstone cladding. Constructed 1939-41, in 1955 it was the only permanent building in the Parliamentary Triangle. Designed in the Inter-War Stripped Classic Style, it relies on its external architectural features for its Commonwealth Heritage values.

62. The building addresses Kings Avenue and sits within a hollow square with the Edmund Barton Offices to the north, Prime Minister and Cabinet, and the Robert Garran Offices to the south, and two unnamed office buildings to the east. While none of surrounding buildings compare with the proposed towers on Block 11 Section 44 in height, in terms of their bulk and massing (particularly the Edmund Barton Offices), they might be seen as overwhelming the architecturally restrained Patent Office.

63. Similar to the situation with the interface between the western end of Cameron Offices and the tower podium proposed for Block 11 Section 44, an aspect of the potential of newer buildings to overwhelm the Patent Office is the interface with the unnamed buildings to the east.



---

64. The interface distance with Prime Minister and Cabinet is approximately 66 metres and with the Edmund Barton Offices – 64 metres. However, with the unnamed buildings to the east have a separation of only 12m at its narrowest points. The buildings have a joint frontage to the Patent Office of 106m and overlap it by approximately 20 metres at either end.



***Photograph Seven. The pedestrian mall between the former Patent Office and the unnamed buildings to the south. High quality paving and structures designed and scaled to complement the existing landscape of the heritage place ensure the integration of the building into precinct, while the contrasting architectural style of new buildings draws attention to the classical features of the heritage place.***

65. The designers engaged for the refurbishment of the Patent Office were also engaged for the new buildings to the east. Site constraints limited the setback between the old and new buildings. Notwithstanding that the Patent Office is now a high security area, the designers created a high activity mall and central courtyard between the new and the old buildings with detailed soft and hard landscapes and active frontages for the new building. The mall has become a major pedestrian corridor between National Circuit and Macquarie Street, with the courtyard providing food and refreshments and a shopfront potential. This has a positive impact on the Patent Office by integrating the heritage building into the commercial precinct and the ongoing daily activity of its business community.

66. The two case studies above demonstrate the robust nature of well-designed heritage buildings and their capacity to survive changes in the city's gradual evolution from the 'Bush Capital'

---

to metropolis. Built during the early development phase of the city, Hotel Acton and the Patent Office were originally considered substantial buildings in the context of early Canberra. However, city growth has reduced their scale in relation to the surrounding landscape and adjacent buildings (where they existed).

67. Both buildings in the case studies have responded positively to change by adapting to accommodation demands of contemporary tenants. They demonstrate that their heritage values are innate and are not dependent on external factors providing an essential context for their being. However, in both cases, sympathetic adjacent development has served to emphasise the contrast between the old and the new, and to focus attention on the intrinsic elements that have given each heritage place its value.

#### **Cameron Offices in a contemporary context.**

68. While there are similarities between the remnant Cameron Offices and Hotel Acton and the Patent Office as outlined above, there is an acknowledged difference - the proposed towers are significantly higher than any building adjacent to the two other heritage places. Photograph Nine (below) provides an aerial view of development in and adjacent to the Section 44 precinct. Buildings, other than Cameron Offices Wing 3, are seven storeys high.

69. The case studies (above) indicate that a satisfactory interface between two buildings of disproportionate height can be established at grade, by the design of intervening land uses, preferably active, that serve the functions of both buildings, and have the capacity through their differences and similarities, to attract attention to the heritage place (i.e., Phillip Law Street between Hotel Acton and Nishi, and the pedestrian mall between the former Patent Office and the unnamed buildings to the south.)

70. Although there is some difference in elevation between the western end of Wings 4 and 5 and the pathway that separates Blocks 7 and 19 from Block 11, there is an opportunity to develop the interface to enhance both properties through sensitive landscape and active uses along the boundary. Drawings provided by Morris Group indicate an intention to use the podium and the podium foreground for purposes that can achieve this objective.

71. Careful design of the towers and podium in terms of external facade, expressed elements and materials and colour palette, can subdue any tendency for the towers to overwhelm the adjacent low rise building below, and ensure that the towers provide a complementary backdrop to the low rise Cameron Offices in the foreground (e.g., Acton/Nishi relationship).

#### **Heritage Impact and the Development Control Plan**

72. The *Belconnen Town Centre Master Plan (September 2016)* states, *inter alia*:

*“There is a concern that some redevelopment on NCA controlled land has not produced the public domain outcomes expected in the centre. Footpaths have not been provided in some areas and requirements for building frontage to key streets have not been enforced. This has resulted in dirt tracks and unused areas.*

*The current height limit of RL 613.7 metres on the NCA controlled land is partly to ensure no buildings will be above the Cameron Offices (RL 614.0 metres). Due to the existing topography this will result in building heights ranging between five and eight storeys. Given the recommended higher building heights on adjacent sites through this master plan, it would be appropriate to work with the NCA to review the RL 613.7 metres requirement to ensure height controls remain relevant.”*

---

73. The approved Development Control Plan No.171/08/003 ('the DCP') states *inter alia*:

"6 BUILDING HEIGHT

6.1 *The maximum building height on Sections 44 and 49 is AHD 613.7 metres excluding rooftop plant. (The maximum height of Building 5 on Block 19 is 614.17)."*

74. While it might be implied from the DCP that the building heights for Sections 44 and 49 are to ensure that no building will be above Cameron Offices, that view is not consistent with the DCP objectives which were adopted from the Territory Plan 2008, nor is it consistent with the planning and urban design objectives of the DCP. Neither set of objectives make reference to Cameron Offices heritage requirements, however clause 7.4 requires that:

*"...the heritage significance and values of those parts of the Cameron Offices entered in the Commonwealth Heritage List or any other applicable statutory heritage listing is to be recognised by the Lessee and reflected in the redevelopment of the site..."*

However, this is not a constraint on the adjustment of the building height provisions for Section 44. There is nothing preventing the amendment of the DCP to reflect contemporary planning and urban design objectives for Belconnen Town Centre.

75. As indicated above, it is the opinion of this Statement of Heritage Impact, that the heritage values of the Cameron Offices are not linked to the height of adjacent buildings, provided that the design of buildings is complementary to the Cameron Offices curtilage.

76. The DCP also states:

" 10. PEDESTRIAN ACCESS

10.1 *A north-south spine is to be provided through Sections 44 and 49 linking Condell Street, running off College St, with the Belconnen Bus Interchange. Provision is to be made to connect the spine through to the Swanson Plaza, and other activities on Section 54, in the event that the Interchange is removed at a future time.*

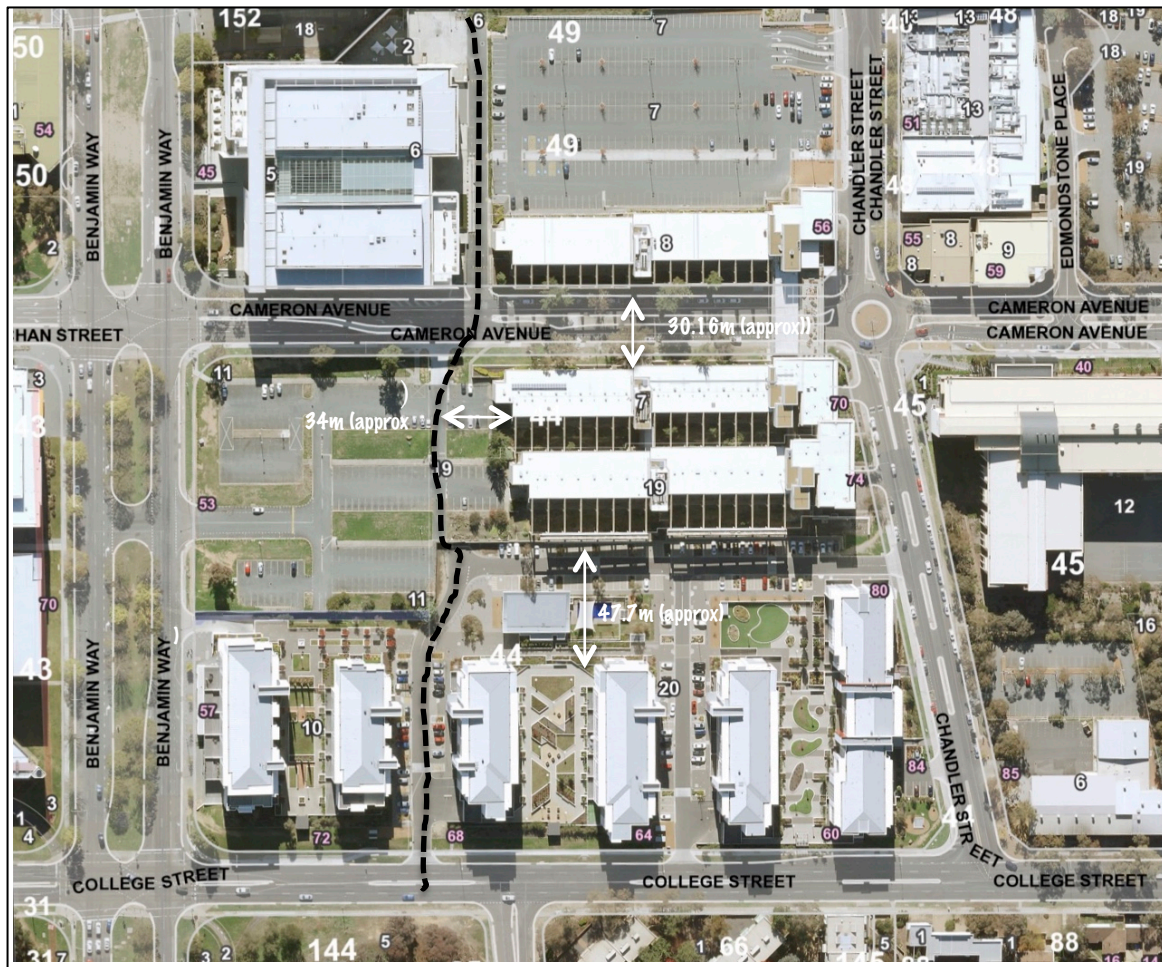
10.2 *The spine is to be a feature within the development, with good lighting, paving, landscaping and activities which will make it attractive in order to encourage its safe use at all times.*

10.3 *The pedestrian spine will comprise an easement included in the leases for all affected Blocks in Section 44 and 49 with provisions made in the leases to ensure free public access is maintained through that area at all times."*

77. Photographs eight and nine (below) show the relationship between Cameron Offices and adjacent developments. In Photograph eight each adjacent development has a well-defined curtilage, and appears in scale with its surrounds. However, Photograph 9 (taken from the Chandler Street intersection with the access road) indicates that there is no complementary relationship between the residential developments and the heritage place.

78. The drawings provided by the Morris Group for this Statement indicate that Block 11 would be developed to provide a more formal relationship between Cameron Offices and the new development, and hence, a significant opportunity to use the required pedestrian access route to develop a complementary relationship between the two developments as suggested by the relationship between Hotel Acton and the Nishi building (Photograph five), or the relationship between the former Patent Office and the unnamed buildings to the south (Photograph seven).

In these photographs the new buildings have been developed with an active frontage at ground level, and the facade of the building acts as a backdrop to the heritage place. The colour palette and subdued detail assist in focusing attention on the heritage place in the foreground.



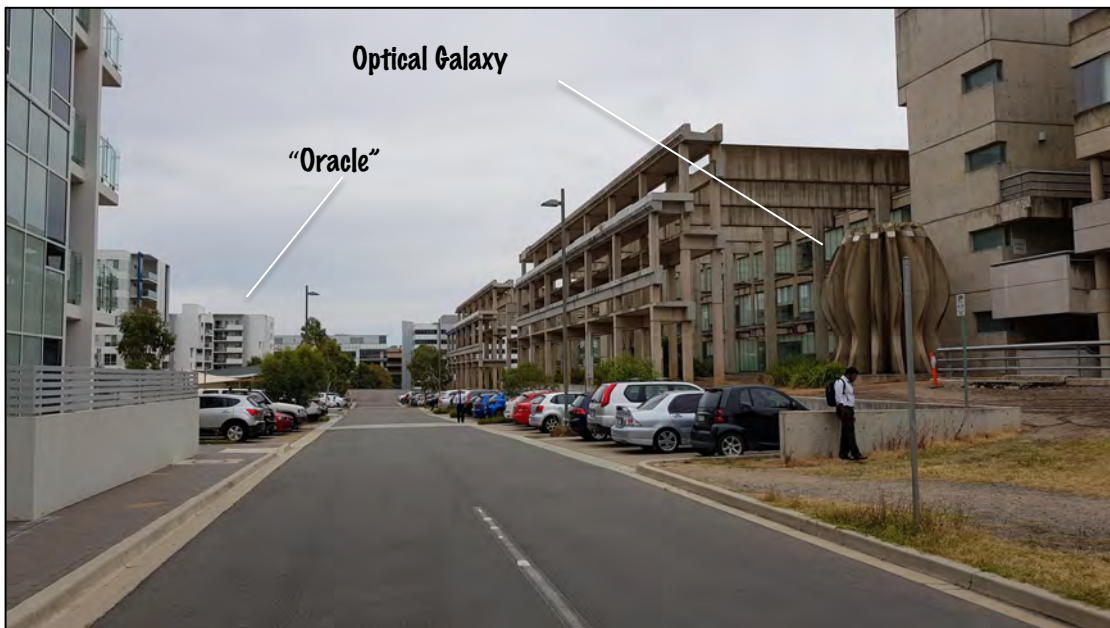
**Photograph Eight. Section 44 Belconnen. The three pairs of seven storey apartment blocks have been arranged in parallel to step down the land as it slopes from Chandler Street to Benjamin Way. The siting echoes the original Cameron Office plan for the wings, which were parallel (except for Wing 9) and stepped down the slope from south to north.**

79. Photograph eight illustrates the failure to achieve the object of the DCP. A service road from College Street providing internal access to Blocks 10 and 20 is misaligned with the car park access road from Cameron Avenue that runs along the rear boundary of Blocks 7 and 19.

80. A metal side-cladding fence defines the common boundary of Blocks 10 and 20 to the south, and Blocks 11 and 19 to the north. The common boundary between Blocks 10 and 20 bisects the College Street access to the two developments with limited opportunity to develop the required pedestrian access as envisaged in sub-clause 10.2 (above).

81. However, the proposed development on Block 11 could be designed with a satisfactory interface with Cameron Offices Wings 4 and 5 as exemplified in Photographs 5 and 7 (above). It would be necessary to rearrange the pedestrian access connection at the intersection of Blocks 10, 11 and 19.

82. The present relationship between Cameron Offices and the apartment blocks to the south is illustrated in Photograph nine (below). The skeleton structure of Courtyard 4 and the elevated walkways of the demolished Wing 6 give the appearance of an abandoned industrial site in stark contrast to the well finished appearance of the apartment blocks opposite. The contrast serves neither development well.



**Photograph Nine.** *The Photograph shows the gallows beams over courtyard 4 and the remnant walkways formerly part of Wing 6. Walkway from Wing 6 Block C is in the background. The central tower is missing. Optical Galaxy is in the foreground.*

83. A cooperative approach to a landscape master plan for the vehicular and pedestrian circulation system for Section 44 could serve to successfully integrate development within the precinct. The outline proposal for the interface between Block 11 and Blocks 7 and 19 could provide a significant urban design anchor, creating an attractive curtilage for Cameron Offices and stimulating activity within the precinct (other than car parking) as envisaged in both the DCP and the Belconnen Master Plan.

## Conclusion

84. This Statement of Heritage Impact relates to proposed action on Commonwealth land adjoining a place on the Commonwealth Heritage List. No direct action is contemplated with respect to the heritage place (Cameron Offices). The land on which the development is proposed is National Land for the purposes of the *Australian Capital Territory (Planning and Land Management Act (1988))*, but the lessee is not an agency of the Commonwealth. In this respect this statement does not fall under the *Environmental Protection and Biodiversity Act 1999 (Commonwealth)*. Nevertheless, it has been considered prudent to examine the potential for a proposed development on abutting land to have an adverse impact on the heritage values of the registered place.

85. Under Commonwealth legislation the values to be considered include not only the official heritage values of the place as set out in the Place Details, but also include potential adverse environmental effects that a proposal might have on a place. With respect to these requirements, attention has been given to the official heritage values relating to Cameron Offices, and to the potential for the proposed development to have an adverse effect on Cameron Offices due to its height, bulk, massing and adjacency.

---

86. In the course of preparing the Statement, two similar cases were examined where low rise heritage buildings are located adjacent to high rise buildings, or adjacent to buildings of greater height, bulk and massing, creating a potential impact on the heritage values of the listed place. However, in both cases it was evident that through careful and sensitive design, the new development did not overwhelm the adjacent heritage place. Most importantly, it was evident in both the case studies that the elements of each heritage building studied were embodied in its architecture, its technical structure, and in a unique innate quality that justified its conservation. In both cases, the building did not rely on its external context.

87. Cameron Offices has similar characteristics. Technically, it remains an important building because of its unique structural system, architecturally it is important for reasons that include the evidence it provides of the architect's intention to make the building pivotal in the life of the Belconnen Town Centre community, and historically it is important in the history of Canberra development, providing evidence of changing attitudes to development in the city. Again, the building is sufficiently robust to withstand the changing environment around it, and it is concluded that the proposed towers will not adversely impact on the heritage values of Cameron Offices.

88. Environmentally (in the broad sense) it would be remiss not to address the failure to fulfill the objectives of the DCP with regard to the proposed pedestrian access from College Street through to Cameron Avenue. The proposed development provides an opportunity to initiate a master plan that can achieve the objective of the DCP, and of the Belconnen Town Centre Master Plan. This is outlined above. The proposed development provides an opportunity to resolve the issues of the Cameron Offices setting by linking the various developments through an integrated landscape plan, while at the same time providing a public benefit by converting the roads and paths around the building into active pedestrian spaces.

This heritage impact assessment has been prepared by:

Paul Dion Cohen MURP, Dip Tech, FPIA,  
Director Campbell Dion Pty Ltd,

#### Annexures

- A. Place Details Cameron Offices (Wings 3, 4 and 5 and Bridge) Chandler Street Belconnen ACT
- B. Development Control Plan 171/08/0003