

Norwood Park Crematorium

Statement of Heritage Effects



Prepared by



For
Norwood Park

Issue C – ACT Heritage Council Submission

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Report Issue Register

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Draft for Client Review	21 June 2024	Mather Architecture
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Quality Assurance

This report has been reviewed and approved for issue in accordance with the Philip Leeson Architects Procedures Manual.

Acknowledgement of Country

PLA respect and acknowledge past, present, and future traditional custodians and elders of the lands on which we live and work. We acknowledge and extend our respect to all Australia's Indigenous peoples.

INTRODUCTION

1.1 Background

This Statement of Heritage Effects has been commissioned by Norwood Park and assess the heritage impact of a proposed new building at Norwood Park Crematorium that would contain new cremators and administrative facilities. The proposed building is shown on architectural drawings prepared by Mather Architecture (dated 14 October 2024) and landscape plans prepared by Plot Design Group (dated 27 September 2024).

Plans for a new building (DA202442734) were submitted to the Territory Planning Authority and referred to the ACT Heritage Council (the Council) on 16 February 2024. The Council advised that the proposal would “diminish the heritage significance of the place, and that design amendments and further information are required”. In particular, concerns were raised regarding the proposed location as well as the design of the building, including its height compared with the nearby heritage buildings. The proposal has been amended in response to this advice and the relevant issues are examined further in this report.

A meeting was also held with ACT Heritage following receipt of ACT Heritage Council commentary on the Development Application. Revised designs were presented during this meeting and the requirements of the Heritage Register entry for Norwood Park were discussed. During this meeting, it was confirmed that a Statement of Heritage Effects application would be required if plantings in the vicinity of the previous boundary are to be impacted.

1.2 Location

The subject site is located at Block 4, Section 54, Mitchell with a street address of 65 Sandford Street. The crematorium site is now accessed from Sandford Street to the north, though originally it was accessed from the south off what is now Nirta Place (prior to Sandford Street existing).



*Aerial showing Norwood Park at Block 4, Section 54, Mitchell (orange) and the original crematorium and chapel
The approximate location of the proposed building is also indicated (blue)
(Source: ACTmapi, showing July 2022)*

The original chapel and crematorium are located on top of the hill which is centrally positioned on the site. The site is now larger than it originally was, having been extended to the east.

1.3 Heritage status

Norwood Park Crematorium is registered on the ACT Heritage Register (the Register) with the 'site boundary' for the Register entry covering the western portion of the current Block. The extent of the shaded area in the Register Entry reflects the approximate boundaries of the original site, albeit it appears to extend a little further to the east and west to include plantings that were located outside the original site boundary.



Norwood Park Crematorium, Mitchell, heritage site boundary
(Source: ACT Heritage Register entry)

Significant features of the site include the chapel, the cremator section, the columbarium wall and the landscaping. Specific attributes of the chapel are identified in the Register entry for the site and are analysed in further detail in Section 4 of this report as part of a design analysis. Significant aspects of the landscape that are relevant to the proposal include:

- The road surrounding the main building as a ceremonial driveway;
- Memorial gardens; and
- Large mature trees that are within and enclose the memorial gardens as well as screen nearby development and roads;
 - The remaining original boundary plantings of White gum (*Eucalyptus wandoo*) that help screen outside development and provide a sense of enclosure, and
 - The post-1966 woodland eucalypts and the original pre-1966 woodland eucalypts, which include, but are not limited to Blakely's red gum (*Eucalyptus blakelyi*), that together help create a sense of enclosure and add a natural, informal character and sense of age and permanency to the memorial gardens.


The ACT Heritage Register statement of heritage significance for Norwood Park Crematorium is reproduced below.

Norwood Park Crematorium has played an integral part in changing attitude towards dealing with the dead, from a burial-based society in the early days of the federal capital to cremation being the preferred method. It demonstrates the principal characteristics of crematoriums in a creative design that allows it to be used by all religious and non-religious people alike while the modern style links it with a period in history when cremation became much more socially acceptable and the process proliferated around the country and the Western world. It is also this welcoming design, open to all, that has made the Crematorium a special place for the community as place of interments and remembrance [criteria (a), (d), (f), (g)].

2 HISTORICAL SUMMARY

2.1 Norwood Park Crematorium



The table below provides a historical summary of the development of the subject site. This information focuses on the area where it is proposed to construct a new building. Information is derived from the Background Information on Norwood Park Crematorium (ACT Heritage Council, September 2019) unless noted otherwise.



Date	Details
1963	<p>In September, it was reported that the Department of the Interior would call tenders for the construction of a crematorium at Gungahlin. The National Capital Development Commission had allocated 9.5 acres, north-west of the racecourse and about four miles from Canberra.¹</p> <p>A 1958 aerial shows that the hill on which the crematorium is now located was partially covered by mature trees prior to the establishment of Norwood Park.</p>  <p><i>Aerial showing location of what is now Norwood Park with substantial trees on the hill in an otherwise relatively treeless landscape (1958) (Source: Geoscience Australia, CAC159, run 1, frame 5021)</i></p>
1964	<p>In April it was reported that Canberra Crematorium Ltd had been granted the lease of the ACT crematorium site. The lease was reported to require the “erection of an approved building, or buildings, costing not less that £60,000”. The company was also required to “undertake screen planting and landscaping to the satisfaction of the Commonwealth”.²</p>
1966	<p>The first cremation took place at Norwood Park on 13 July 1966. The original building was designed by Rosman Hastings & Sorel.</p>


¹ ‘Crematorium Tenders Soon’ *The Canberra Times*, 24 September 1963, p1

² ‘Lease for ACT Crematorium’ *The Canberra Times*, 11 April 1964, p6

Date	Details
	<p data-bbox="421 259 1331 360">An aerial photograph from a couple of years after the opening of the crematorium shows that many of the existing trees were retained with additional planting provided to the perimeter of the site.</p>  <p data-bbox="421 1106 1222 1160"><i>Aerial of Norwood Park with approximate location of the proposed building indicated (1968) (Source: Geoscience Australia, CACC12, Run 6 Frame 9673)</i></p>
<p data-bbox="253 1178 312 1209">1973</p>	<p data-bbox="421 1178 1251 1245">The administration building on the west side of the driveway was designed by Rosman Hastings & Sorel.</p>  <p data-bbox="421 1968 1331 2040"><i>Aerial of Norwood Park showing the administration building (arrow) with the approximate location of the proposed building (yellow) and alignment of original boundary plantings (green) indicated (1977) (Source: Geoscience Australia, SOC35, Run 7, Frame 200)</i></p>

Date	Details
<p>Late 1970s-early 1980s</p>	<p>Sometime between 1973 and 1983, two additional rows of trees were planted to the perimeter of the site, outside the line of the original trees and potentially also outside the boundary of the original lease.</p>  <p><i>Aerial of Norwood Park with the approximate location of the proposed building (yellow) and alignment of original boundary plantings (orange) indicated (1983)</i> (Source: Geoscience Australia, SO548, Run 5, Frame 113)</p> <p>A coloured aerial photograph from 1985 indicates that the grey-green coloured trees (Argyle Apples) and the outer row of Blue Gums in the area where the proposed building would be located were part of the later plantings (post-1973).</p>  <p><i>Aerial of Norwood Park with the approximate location of the proposed building (yellow) and alignment of original boundary plantings (orange) indicated (1985)</i> (Source: Geoscience Australia, SOC670, Run 8, Frame 18)</p>

Date	Details
1992	<p>The administration building was extended. By the early 1990s, the three rows of trees formed a dense row of plantings to the perimeter of the site.</p>  <p><i>Aerial of Norwood Park with the approximate location of the proposed building indicated (1991) (Source: Geoscience Australia, AUS/C271, Run 8, Frame 891)</i></p>
2000	<p>The condolence pavilion, designed by Freeman Leeson Architects, was built to the east of the crematorium. The car park to the north-east of the original driveway had been constructed by this time. By 2004, Norwood Park had been extended to the east.</p>  <p><i>Aerial of Norwood Park with approximate location of the proposed building indicated in yellow (2004) The condolence pavilion is indicated by the blue arrow and the section of original wall which has since been demolished is indicated by the orange arrow (Source: ACTmapi)</i></p> <p>The original brick wall located to the north of the Condolence Pavilion was demolished sometime between May 2004 and Spetmeber 2006.</p>

Date	Details
2020	<p>The gravel overflow carpark appears to have been formed at this time. A marquee was installed in this location in early 2020 when works to extend the chapel and the condolence pavilion were underway.</p>  <p><i>Aerial of Norwood Park with the overflow car park indicated (November 2020) (Source ACTmap)</i></p>

3 PHYSICAL DESCRIPTION

This section provides an overview of the current Norwood Park Crematorium site together with some commentary on the current format and level of intactness of the built elements. Additionally, it provides further detail on the area where the proposed new crematorium building would be located.

3.1 Norwood Park

The size of Norwood Park has increased since it opened in 1966 as the primary access to the site has changed as it was originally from the south-west via Nirta Place rather than the current northern approach off Standford Street. In the original configuration, mourners looked back over the city after leaving the crematorium. The original crematorium and chapel are centrally located on the apex of the sloping site. These buildings are surrounded by the original circular driveway. To the north of the driveway is an asphalt carpark that was developed in stages.



Original entry from Nirta Place



Plantings adjacent to the original circular driveway

The site is covered by trees of varying ages including remnant eucalypts that existed before the crematorium was established. These have progressively been supplemented by plantings over the decades, including formal rows of trees to the periphery of the site. Much of the original portion of Norwood Park has been transformed into established memorial gardens. These now also extend to an additional parcel of land to the south-east.

3.2 Buildings

This section focuses on changes that have been made to the original chapel and crematorium building as well as the later additions that are located in relatively close proximity to the site of the proposed new building. It also provides some more specific information on the crematorium part as this area has become inadequate from an operational and safety perspective. A more detailed design analysis of the original chapel and crematorium building is located in Section 4.

Chapel and crematorium

The original chapel and crematorium building hug the fall of the land, stepping down the site to the south with the crematorium part located lower and largely screened by long, face brick walls. The chapel portion of the building has been considerably enlarged and the associated flanking courtyards have necessarily been altered. Despite this, and the changes to the original material palette, the original building remains demonstrative of a well-designed crematorium of the 1960s.

The east courtyard is more altered than the west owing to construction of the Condolence Pavilion and associated covered walkway, as well as the demolition of part of the original blade walls that enclosed the courtyard on the north side.



Addition to the east side of the chapel



Original face brick walls to the crematorium which also contains the toilets

The Condolence Pavilion and more recent additions have a cuboid form and are constructed of face brick, render and horizontal timber cladding. Render has been painted a dark grey colour and timber cladding has a clear finish. Like the original building, windows are aluminium framed. These buildings are lower than the height of the original chapel roof, save for the small, light-weight dome that sits behind the masonry parapet wall.



The Condolence Chapel with later timber additions



The service vehicle driveway to the crematorium

Operational arrangements

The extant cremators are used for both cremation following services in the associated chapel and cremation of others that are delivered to the site. It is understood that these cremators have reached end of life and that new cremators are considerably more energy efficient. It is also understood that the lift which allows for the coffin to be moved between the catafalque in the chapel and the cremator section regularly breaks down.

Further challenges with the existing facility include the configuration of the crematorium and the associated flanking walls, together with the slope of the vehicle access road which makes delivery conditions challenging. Many of the walls to this area contain columbarium niches.

Whilst most of these issues relate to services/back of house functions, for some cultures it is customary to view the casket as it enters the cremator. Whilst a small viewing room exists in the existing facility to allow this, the space can only be accessed via stairs from the chapel, limiting access for those with mobility issues and prams etc.

Office

The 1973 office building was constructed in a similar mode to the original chapel and crematorium building having a cuboid form with horizontal emphasis owing to the low flat roof and the long format of the brick blade walls. The material palette is also similar with brown face brickwork and large areas of glazing.

The modest sized building has already been extended with the verandah infilled in the early 1990s to provide more internal space. The building is no longer of sufficient size to accommodate the required number of staff.

3.3 The proposed site

The proposed site for the new crematorium building would be located in proximity to the original circular driveway, opposite the condolence pavilion which was constructed in 2000. The area to the north and east of the driveway has been altered on multiple occasions since Norwood Park was established in 1996. Originally this area was located beyond the tree lined boundary that was planted during the 1960s.



Aerial showing location the area of the proposed new building (Source: ACTmapi, showing November 2023)

It appears that many of the original boundary plantings near the proposed site (noted to be *Eucalyptus wandoo* in the Register Entry) were removed in circa 2000 when the car park to the north-east of the circular driveway was constructed. The late 1970s/early 1980s plantings of Argyle Apple also appear to have largely been removed from the subject area during this time. A row of these trees does remain in the nearby portion of the existing asphalt car park.

The second row of the two rows of plantings introduced in the late 1970s/early 1980s is more intact, albeit several specimens have been removed creating gaps. These plantings consist of relatively slender Blue gums, planted close together and assessed as being in fair health.



Panoramic view with the proposed site located in the centre of the image. The Argyle apples are evident at the left of the image and the slender Blue gums are located in the centre of the image

To the south-east of the row of Blue gums is a levelled area that was created in 2020 when works to extend the chapel and condolence pavilion were underway. This area is at a slightly lower elevation

than the original chapel (about 1 metre lower) and looks out over the extended grounds of Norwood Park to the east. The later parts of the grounds have been planted with a variety of trees, including Golden elms that have been introduced in recent decades. The area is currently covered in gravel and is bound by a school type metal fence.



Gravel area with row of Blue gums



Row of Blue gums adjacent to gravel area

3.4 Commentary on the existing heritage assessment

During the preparation of this report, a review of the existing assessments (the Register Entry and the Background Document) was undertaken as well as additional historical research to understand the development of the site. Preliminary findings were discussed with ACT Heritage and the commentary provided is summarised in the table below. This commentary has informed the preparation of this Statement of Heritage Effects.

Attribute	PLA Commentary	ACT Heritage Commentary
<p>Site boundary</p>	<ul style="list-style-type: none"> The site boundary is identified in the ACT Heritage Register Entry on page 10. This includes the original Norwood Park site and additional land to the east and west sides, including later rows of trees. Conflicting with the depicted site boundary, the assessment under criterion (f) in the Register entry notes ‘the registration boundary is confined to just the road surrounding the main building complex’. 	<p>It was confirmed that the site boundary shown on the plan is the one that applies when assessing proposals.</p>
<p>Boundary plantings</p>	<ul style="list-style-type: none"> ‘The remaining original boundary plantings of White gum (<i>Eucalyptus wandoo</i>) that help screen outside development and provide a sense of enclosure’ are identified as significant features in the Register Entry. There are no White gums in the vicinity of the proposed building location. Aerial photographs obtained during the preparation of this report show that the original single row of boundary plantings were supplemented by an additional two rows of plantings sometime between 1973 and 1983. The eucalypts in the location of the proposed building date from this period and are not original plantings. It is likely that the plantings to the perimeter of the site were introduced to screen the 	<p>It was confirmed that the Advice team had queried the Registrations team regarding the species of the original boundary plantings. Given the findings of the tree assessment report submitted with the Development Application, it was considered likely that the original species had been incorrectly identified in the Register Entry.</p> <p>ACT Heritage encouraged the submission of additional historical information with the revised proposal.</p> <p>It was confirmed that the boundary trees would be considered as</p>

Attribute	PLA Commentary	ACT Heritage Commentary
	<p>crematorium from view rather than screening outside development. This is supported by the Commonwealth Government’s requirement for the lessee to provide screen planting at the time the lease was awarded. It is also noted that the crematorium was established well before the nearby suburb of Mitchell, which was officially named in May 1975, despite early planning commencing in 1969 (and then being shelved).³</p>	<p>significant features regardless of them being original or later plantings.</p>
<p>Other significant trees</p>	<ul style="list-style-type: none"> • ‘The post-1966 woodland eucalypts and the original pre-1966 woodland eucalypts [...], that together help create a sense of enclosure and add a natural, informal character and sense of age and permanency to the memorial gardens’ are also identified as significant features in the Register Entry. <p>Beyond the above statement, there is no further discussion in the Register Entry (such as the assessment against heritage significance criteria) or in the Background Document to assist with understanding how all eucalypts on the site are significant.</p> <ul style="list-style-type: none"> • The Background Document notes that the grounds have been extensively modified to suit the changing needs of the facility. It also notes that the changes do not detract from the original building, but does alter the landscape setting from the original natural informal landscaping to more areas of formal landscaping. 	<p>These trees were not discussed in detail at the meeting.</p>

³ ‘Mitchell’ *The Canberra Times*, 18 November 1979, p12

4 ANALYSIS OF HERITAGE EFFECTS

4.1 Introduction

This Statement of Heritage Effects has been prepared to assess the impact of the proposed administration and cremator building on Norwood Park. Based on discussions with ACT Heritage, the following requirements of the *Heritage Act 2004* have been considered where works would impact on trees in the vicinity of the original boundary:

- The likely effects of the proposed activity on the heritage site (section 4.3)
- The measures the applicant will adopt during the activity to reduce the risk of diminishing the heritage significance of, or damage to, the heritage site (section 4.5)
- Whether other reasonably practicable ways of carrying out the activity at the heritage site are available (section 4.4)

4.2 Design analysis of proposed building

This section includes a design analysis of the original chapel and crematorium and provides some commentary on the proposed new building relative to the key characteristic of the heritage building. This commentary has been prepared in response to the advice from the ACT Heritage Council requesting an analysis of the how the proposed building (with a revised design) achieves a complementary design outcome.

The ACT Heritage Council Advice also noted that the “Council supports high quality design outcomes that are complementary with the heritage character of the place”. Consistent with this advice, the *Australia ICOMOS Burra Charter* states that new work “may be acceptable where it respects and does not [...] detract from its interpretation and appreciation” and that “new work should be readily identifiable as such, but must respect and have minimal impact on the cultural significance of the place”.

Characteristic	Original chapel and crematorium	Commentary on the proposed building
Form	<p>One of the most prominent characteristics of the original building and the associated elements is the horizontality of the structure which nestles into the top of the hill. Whilst this has been partially impacted by changes that have occurred (additions to the original chapel and demolition of some of the original walls) the horizontality of the design continues to be emphasised by:</p> <ul style="list-style-type: none"> ○ The horizontal plane of the chapel roof which projects over the driveway to form a port-cochere. The fascia is clad in horizontal timber boards which give further horizontal emphasis. ○ The long face brick walls which extend out from the chapel to partially enclose the flanking courtyards. ○ The frameless glass windows above the brick walls which make the roof appear as if it is floating. 	<p>The design of the proposed building has been amended to better reflect the horizontality of the original chapel and crematorium and achieve a more complimentary design. This has included:</p> <ul style="list-style-type: none"> • Changes to the form of parapet walls to provide a horizontal skyline (rather than pitched form) when viewed from the north and west. • Changes to the format of the roof and a reduction in the pitch to maintain the cuboid/horizontal form of the building when viewed from both within the boundaries of the registered site and the original driveway. • A reduction in the height of the proposed building and a reduction in the width (height) of the proposed fascia to achieve a lower building with greater horizontality that reflects the proportions of the original chapel and crematorium building. • Changes to the format of walls to the loading bay to give this section, which is located in closest proximity to the original building, a horizontal, cuboid form.

Characteristic	Original chapel and crematorium	Commentary on the proposed building
	<ul style="list-style-type: none"> ○ The long, cuboid form of the crematorium structure to the rear of the chapel which is largely screened by long brick walls. ○ The long, rectangular format of the reflection pools. <p>The cuboid design of the building, with concealed roof sheeting and deceptively simple detailing, is key to its modern style.</p>	<p>To minimise the use of box gutters which are prone to leaks, the rear of the building would have expressed eaves (rather than a parapet) giving this part of the building a somewhat different form, particularly to the east side where the pitch (albeit a low pitch) would be evident. Given that this side of the building is located outside the heritage boundary and away from the original buildings, it would not impact on the significance of the place. Further, the lack of parapet to this side, combined with the lower pitch of the roof, would serve to reduce the bulk of the proposed building.</p>
Bulk/Scale	<p>The separate articulation of the chapel and the crematorium, together with the stepping down of the building down the hill, serves to break down the perceived scale of the original building. This articulation, together with the surrounding landscape and the various brick walls, means that the chapel and the crematorium are not both fully visible from the same location.</p> <p>Both the crematorium and the chapel originally consisted of long, skinny forms that also served to reduce the perceived scale of the building.</p>	<p>The design of the proposed building has been amended so that is now lower than the roofline of the original chapel. The amendments have reduced the height of the proposed building by almost two metres so that the visual prominence of the original buildings would be maintained. With the proposed roof to be approximately 800mm lower than the roof of the original building, it would be level with the Condolence Chapel which was constructed in much closer proximity to the original facility.</p> <p>The proposed building would contain a substantial amount of new accommodation to serve the growing needs of the crematorium. This accommodation would be provided across a single level owing to accessibility requirements.</p> <p>The articulation of the proposed building, particularly the eastern side which faces the original buildings, breaks down its form into smaller parts. This includes the long projecting, parapet wall to the loading bay and the long, horizontal form of the fascia over the ancillary services (reception, office, meeting rooms, toilets). The different treatment to these parts would serve to break up the perceived scale of the building, albeit in a slightly different way to that original chapel and crematorium building. The long, horizontal forms used to articulate the building would however be complementary to the slim format of the original building.</p>
Character	<p>The design of the original chapel incorporates elements of modern, post-WWII architecture via the use of cuboid forms, horizontal strips of frameless glass and the generous roof overhang to the front. Aspects of the design also reflect a more regional approach including the large, uninterrupted areas of face</p>	<p>The design of the proposed building has a contemporary character that draws on/incorporates key characteristics of the original chapel and crematorium building in order to complement the latter. Whilst these characteristics are discussed under other headings, those that relate to the original building/planning include:</p>

Characteristic	Original chapel and crematorium	Commentary on the proposed building
	<p>brick, the use of stained timber (since overpainted), the split level which follows the slope of the site and the largely undisturbed indigenous trees which are supplemented by additional native plants. The brick walls have considerable girth, giving them a robust appearance that contrasts with the apparent lightness of the roof that seemingly floats above the frameless glazing.</p>	<ul style="list-style-type: none"> • Cuboid forms, broad eaves and deep horizontal fascias; • Horizontal strip of windows to the loading bay; • Projecting, horizontal blade wall to the front of the loading bay; • Use of clear finished timber and dark coloured (unpainted) masonry; • Planting of native trees in the vicinity of the building to give a natural, informal character.
<p>Texture and materials</p>	<p>The material palette of the original building was relatively textured and had a tactile quality due to the use of face brick, stained timber (now overpainted) and copper doors (now replaced). It is acknowledged that this quality has been partly impacted by later changes.</p> <p>The material palette is relatively restrained, with a single material typically used for each element.</p>	<p>Proposed materials would include dark grey coloured fibre cement wall cladding, dark grey brick walls, a dark grey precast concrete wall finish, masonry to the plinth and clear finished timber boards to the soffits. The proposed masonry finishes, together with the timber boards to the soffits would relate to the tactility of the original building, albeit in a contemporary way.</p> <p>The proposed use of horizontal metal cladding to the fascias would reference the horizontal timber cladding to the fascias of the original building and would be a contemporary interpretation of the original detail.</p> <p>Whilst a larger number of materials is proposed to the new building when compared with the original, the colour palette would be similarly restrained. Additionally, the proposed materials have been used as a way to further modulate/articulate the form of the proposed building. This includes the incorporation of horizontal bands of fibre cement wall cladding to separate the more robust masonry wall from the roof above, reflecting the format of the frameless glass to the original chapel.</p>
<p>Colour</p>	<p>The original building was constructed with materials that had natural earthy/warm tones.</p>	<p>The colour of external materials to the proposed building has been refined to better reflect the dark, earth tones of the original chapel and crematorium building. Changes to the proposed colours include use of a dark grey precast concrete and dark grey brick (rather than white) to the walls to better complement the dark brown brick of the original chapel and crematorium.</p> <p>The proposed colours would be comparable with the dark grey colours used on the Condolence Chapel, drawing on the contemporary colour palette which is sympathetic with the dark, earthy colour palette of the original buildings.</p>

Concluding remarks on design

The amended design of the proposed new crematorium building would have a contemporary character that is complementary to the original chapel and crematorium building.

The height of the building has been considerably reduced to avoid overwhelming or visually dominating the original chapel and crematorium building. The form and articulation of the building has also been amended so that it reflects and complements the cuboid format, horizontality and slender proportions of the original building. The materials and colours have also been refined to be more in keeping with that of the original building and reflect the contemporary Condolence Chapel. This would serve to limit the number of materials and colours on the site, creating a more cohesive and sympathetic character.

4.3 Assessment of Heritage Impacts

This section includes an assessment of the proposal on the heritage significance of Norwood Crematorium. In the absence of a Conservation Management Plan and any specific guidelines, this assessment is based on good heritage practice and the approaches outlined in the *Australia ICOMOS Burra Charter*. This assessment centres on aspects of the proposal that were the focus of the ACT Heritage Council Heritage Advice.

Proposed Works	Assessment
Removal of eleven <i>Eucalyptus bicostata</i> (Blue Gum) to allow for construction of the proposed new crematorium building	<p>The aerial photographs obtained as part of our research demonstrate that the eleven <i>Eucalyptus bicostata</i> that would be removed as part of the proposal were introduced as part of an additional two rows of plantings established sometime between 1973 and 1983 rather than being part of the original 1960s row of boundary plantings. Information provided by the site survey also demonstrates that these trees are located beyond the original site boundary (as defined by the earlier Block boundary).</p> <p>Whilst the trees are not part of the original boundary plantings, ACT Heritage have confirmed that all plantings in the vicinity of the original boundary were identified as significant features by the ACT Heritage Council and that their removal would “diminish the landscape setting of the Crematorium” and may also diminish the sense of enclosure the existing landscaping provides the Crematorium”. In response to this Advice, several alternate locations for the proposed new building were explored as shown on the accompanying architectural drawings (refer fo DA007). Further discussion on these alternatives is provided at Section 4.4.</p> <p>Noting that the subject <i>Eucalyptus bicostata</i> do provide some enclosure to this part of the site owing to previous tree removal, a variety of mitigation measures are proposed to maintain/reinstate this sense of enclosure. These are discussed at Section 4.5. Given the extent of proposed new trees, combined with confirmation that the existing trees are not original, it is our assessment that their removal would not diminish the heritage significance of Norwood Park Crematorium.</p>
Removal of one <i>Eucalyptus mannifera subsp. mannifera</i> (Brittle Gum, unregulated) and another unregulated Eucalypt to allow for construction of vehicle accessways	The two Eucalypts that would be removed to allow for construction of vehicle accessways to the existing carpark were introduced during the 1990s, presumably following the construction of the carpark. Given that these trees are of relatively recent original and that additional plantings would be provided as part of the proposal, their removal would not have an adverse impact on the heritage significance of Norwood Park.
Construction of a new crematorium building and associated landscaping	<p>Refer to the design analysis at Section 4.2 above.</p> <p>A discussion on the proposed new plantings is provided at section 4.5 below.</p>

4.4 Exploration of Alternatives

In response to the Heritage Advice provided regarding DA202442734, this section discusses the feasibility of alternate locations for the proposed new crematorium building. As per the requirement of *Heritage Act 2004* various alternatives to the proposed location were explored to determine if there are other reasonably practical sites for a new crematorium building that would avoid the need to remove trees in the vicinity of the original site boundary.

There are several key considerations relating to the siting of a new crematorium building which relate to intended function. These include:

- Proximity to the original chapel to allow mourners to readily move between the chapel and the viewing room in the crematorium;
- Ability to provide an accessible path of travel between the new building and the original chapel;
- Proximity to the existing road network to limit the need for additional roads;
- Proximity to the existing parking area in order to limit the need for additional parking at Norwood Park;
- Avoiding impact on existing memorial gardens.

As evident in the aerial photographs included in the architectural drawings (refer to DA006 Opportunities and Constraints), much of Block 4 Section 54, Mitchell is covered by established gardens (mostly memorial gardens) and associated infrastructure, including the landscape/management compound, parking areas and bodies of water. Current areas of open space are located adjacent the landscape/waste management compound and to the north-east corner of the site.

The space adjacent to the compound is not a practical place to construct the proposed new building given that it is located a considerable distance from the chapel and due to its position at the opposite end of Norwood Park to the existing carpark. Provision of carparking and the required facilities in the available open space would not be possible.

Three alternative locations to the north-east part of the site were looked at as part of an option study, as shown on the architectural drawings (DA007). These locations were considered impractical for the following reasons:

- Due to the relatively steep slope of the site, it is considerably more difficult to provide an accessible path of travel.
- It is much further for people to travel between the original chapel and the viewing room in the crematorium.
- Other locations are in close proximity to either the site boundary or the memorial gardens which contain human ashes. The former would mean that the building is likely to be more visible from the adjacent road which is contrary to the original idea that the facilities be screened from public view.
- Vehicle access for the hearse would be via the public carpark which is less than ideal as when travelling to and from the chapel it would be required to navigate the parking area.

These studies confirm that there are no alternate areas of open space where it would be practicable to site the new building.

4.5 Measures to Reduce Heritage Impact

In accordance with the *Heritage Act 2004*, this section identifies the measures that are proposed to reduce the potential heritage impact of the proposed works. These measures include retention of additional trees compared with the initial Development Application as well as the provision of new plantings that include:

- Establishment of new plantings to the perimeter of the proposed new crematorium building including garden beds to the front of the building which faces the original crematorium. Plantings to the front would include *Eucalyptus mannifera* 'Little Spotty' (Dwarf Brittle gum) and *Eucalyptus*

pulvereta 'Baby Blue' which are more compact Eucalypts that are better suited to being located in proximity to buildings. Whilst these new trees would not be of the scale of the previously plantings in the vicinity of the original site boundary, they would serve to soften the front of the new building and would reestablish a line/group of Eucalypts in the vicinity of the original site boundary. These plantings together with the building, would mean that sense of enclosure to this area is maintained.

- In addition to the above, supplementary plantings of *Eucalyptus mannifera* 'Little Spotty' would be provided in the garden bed adjacent to the carpark. These would be located adjacent to retained *Eucalyptus cinerea* and would reinstate greater definition to the previous linear plantings in this area.
- Several new trees would also be planted along the current north-east boundary of the site. These would be a mix of *Eucalyptus melliodora* (Yellow Box) and *Eucalyptus blakelyi* (Blakely's Red Gum) which would complement the existing landscape character of the site and provide improved screening between the modern roads and the crematorium, a characteristic that was required when the crematorium was established.

5 CONCLUSION

The design of the proposed new crematorium building has been amended and refined to be complimentary to the original chapel and crematorium building at Norwood Park and to avoid overwhelming or visually dominating the listed heritage place. In particular, the height of the proposed building has been considerably reduced and the form and articulation of the building has been resolved so that it reflects and complements the cuboid format, horizontality and slender proportions of the original building. The materials and colours have also been refined, to be more in keeping with the heritage place.

The aerial photographs obtained as part of our research demonstrate that the eleven *Eucalyptus bicostata* that would be removed as part of the proposal were introduced as part of an additional two rows of plantings established sometime between 1973 and 1983 rather than being part of the original 1960s row of boundary plantings. Whilst the trees are not part of the original boundary plantings, ACT Heritage have confirmed that all plantings in the vicinity of the original boundary were identified as significant features by the ACT Heritage Council.

As set out in this Statement of Heritage Effects, there are no other reasonably practicable places to site the proposed building owing to the location of related functions (the chapel, car park and road), the topography of the site and the extent of the existing memorial gardens.

Noting that the eleven *Eucalyptus bicostata* do provide some enclosure to the subject part of the site owing to previous tree removal, it is proposed to plant a larger number of new trees to mitigate their removal. This would include compact Eucalypt plantings to the perimeter of the proposed building and in the garden bed adjacent to the carpark, together with the planting of several Eucalypts to the current north-east site boundary. These plantings, together with the new building, would mean that the sense of enclosure to the area is maintained and enhanced. This combined with confirmation that the existing trees are not original means that the proposal would not diminish the heritage significance of Norwood Park.