Heritage (Decision about Provisional Registration of Former Commonwealth Bank Building, City) Notice 2023

Notifiable instrument NI2023-493

made under the

Heritage Act 2004, s34 (Notice of decision about provisional registration)

1 Name of instrument

This instrument is the *Heritage* (*Decision about Provisional Registration of Former Commonwealth Bank Building, City*) *Notice* 2023.

2 Decision about provisional registration

On 15 August 2023, the ACT Heritage Council (the *Heritage Council*) decided not to provisionally register Former Commonwealth Bank Building, Block 2, Section 13, City (the *Place*).

3 Description of the Place

The description of the Place is in the schedule.

4 Reasons for the decision

The Heritage Council is not satisfied on reasonable grounds that the Place is likely to have heritage significance as defined by section 10 of the *Heritage Act 2004*. A detailed statement of reasons, including an assessment against the heritage significance criteria, is provided in the schedule.

5 Date decision takes effect

The decision not to provisionally register the Place takes effect on 16 August 2023 (being the day after the Heritage Council made its decision in writing as set out in the schedule).

Stuart Jeffress A/g Secretary (as delegate for) ACT Heritage Council 15 August 2023

Schedule

(see ss 3 and 4)



STATEMENT OF REASONS DECISION NOT TO PROVISIONALLY REGISTER FORMER COMMONWEALTH BANK BUILDING BLOCK 2 AND SECTION 13, CITY IN THE ACT HERITAGE REGISTER

In accordance with s32 of the *Heritage Act 2004*, the ACT Heritage Council has decided not to provisionally register Former Commonwealth Bank Building, City. This Statement of Reasons provides an assessment of Former Commonwealth Bank Building, City, and finds that the place does not meet any of the criteria under s10 of the *Heritage Act 2004*.

This statement refers to the location of the place as required in s34(5)(b)(ii) of the Heritage Act 2004.

LOCATION OF THE PLACE

Former Commonwealth Bank Building, 187 London Circuit, corner of Ainslie Place, Block 2, Section 13, City.

This section refers to the description of the place as required in s34(5)(b)(iii) of the *Heritage Act 2004*. The boundary of the place is illustrated at Image 1.

DESCRIPTION OF THE PLACE

• Former Commonwealth Bank Building, also known as the Commonwealth Savings Bank.

This statement refers to the Council's reasons for its decision as required in s34(5)(b)(iv) of the *Heritage Act 2004*.

REASONS FOR DECISION

The Council is not satisfied on reasonable grounds that the place is likely to have heritage significance as defined by s10 of the *Heritage Act 2004*.

This statement refers to the Council's assessment of the place against the heritage significance criteria as a part of its reasons for its decision as required in s34(5)(b)(iv) of the *Heritage Act 2004*.

ASSESSMENT AGAINST THE HERITAGE SIGNIFICANCE CRITERIA

The Council's assessment against the criteria specified in s10 of the Heritage Act 2004 is as follows.

In assessing the heritage significance of Former Commonwealth Bank Building, City, the Council considered:

- the original nomination and documentary evidence supplied by the nominator;
- the Council's Heritage Assessment Policy (March 2018);

- information provided by a site inspection on 5 August 2021 and 23 February 2022 by ACT Heritage; and
- the report by ACT Heritage titled, *Background Information Former Commonwealth Bank Building, August 2023*, containing photographs and information on history, description, condition and integrity; and

Pursuant to s10 of the Heritage Act, a place or object has heritage significance if it satisfies one or more of the following criteria. Future research may alter the findings of this assessment.

(a) importance to the course or pattern of the ACT's cultural or natural history;

The Council has assessed the Former Commonwealth Bank Building (FCBB) against criterion (a) and is not satisfied that the place meets this criterion.

Approved by the National Capital Planning Committee (NCPC) in 1965, and opened in 1967, the FCBB was associated with a significant period of development of the city centre under the direction of the National Capital Development Commission (NCDC).

NCDC concepts for the further development of the city centre in the 1960s reflect the considered management of issues of height, bulk, scale, form. Multistorey office developments were proposed to the east of the Civic Square area achieving a tiered affect with lower-level buildings defining the Ainslie Avenue axis off London Circuit graduating to higher buildings further back. It is likely that elements of the external presentation of the FCBB result from these and other design intentions of the NCDC, which were imposed on the building design through the requirements set out in the lease of the land. Those elements of the design that may have been influenced by the NCDC's requirements include:

- The use of distinctive architectural design elements, including the 'form, silhouette and the colours and textures of the finishing materials', as well as an emphasis on strong horizontal elements softened by rhythmic vertical lines:
- The coordination of these features and the building height with nearby buildings in Sections 13, 14 and, particularly in the Civic Square precinct, to achieve a coherent design composition;
- The presentation of FCBB as a 'portal' building to balance road access and amenity, and to achieve a sense of balance and proportion between it and its neighbouring buildings;
- The FCBB reflects the NCDC's encouragement of private enterprise investment in the achievement of its planning intentions, in which they assessed the designs put forward by eminent private architects for their conformity to their standards; and
- The encouragement of the inclusion of sculptural works within new buildings as a part of projecting an appropriately sophisticated and progressive image for the city of Canberra.

In recommending approval for the building in September 1965, the NCPC noted its 'high standard' of design. However, although the urban development context of the FCBB in the 1960s was notable and the building remains prominent in its location, the clarity of the overall urban composition has been diminished by changes in the wider area over time. The Ainslie Avenue axis is not as clear and distinctive as it once was and the relative height and symmetry of the surrounding urban context is changing.

Furthermore, while the building is consistent with the NCDC planning framework for its time, it does not independently represent a unique facet of the urban planning

framework. The building is not a prominent early example of construction under the NCDC's plans. Consistent with its former use as a bank, it was located in an area designated by the NCDC for commercial buildings and, although there was some focus on creating a façade suitable to its prominent position, the building requirements were not unique to this building. Consequently, beyond the peripheral association of the building to the Ainslie Avenue axis and the Civic Square Precinct, it cannot be demonstrated that the presence and presentation of the FCBB itself was important to the course or pattern of the ACT's cultural history with regards to urban planning.

The incorporation of artworks was a prominent part of the design of this building and this possible related to the efforts of the NCDC to promote and encourage the incorporation of artworks in public spaces and as part of buildings. While many of the known examples are government buildings, the practice was also occasionally extended to other buildings, including commercial buildings. However, it cannot be demonstrated that the inclusion of artworks on buildings at this time was in itself a coherent aspect of cultural history that made a strong, noticeable or influential contribution to the ACT's society.

The FCBB was also associated with the provision of banking services in the city from the 1960s until 2020. However, it cannot be demonstrated that, as a banking facility, the FCBB served a particularly strong, noticeable or influential role compared to other bank branches. This place was one amongst a number of bank branches that opened in Civic during the NCDC driven developments in Civic during the 1960s. Amongst the buildings established in Civic in the 1960s, this place was possibly the second-longest operating bank branch, at 53 years, and would appear to be the most original in its external presentation. However, while distinctive in style the external façade is not characteristic of the function of the building as a bank and could have been associated with other commercial buildings at that time. Independently of other characteristics, the length of the association does not in itself represent importance to the course or pattern of the ACT's cultural history. The FCBB did provide foreign currency exchange, which may not have been provided at other branches, however there is no substantial evidence to suggest this in and of itself made a strong, noticeable or influential contribution to the ACT's cultural history. Other examples of bank branches from this period also exist in town, district and local centres, such as the three banks that were established in the suburb of Curtin in 1962.

(b) has uncommon, rare or endangered aspects of the ACT's cultural or natural history;

The Council has assessed the Former Commonwealth Bank Building (FCBB) against criterion (b) and is not satisfied that the place meets this criterion.

The FCBB does not appear to be uncommon or rare as post-war bank building in Canberra. While the contextual history of bank buildings in the ACT is not well documented, there are a number of other surviving examples in the City and elsewhere within the ACT.

The FCBB is not an uncommon or rare example of the Late Twentieth Century International style. A number of other examples are known to survive, including major examples such as the Cameron Offices and the Edmund Barton Building.

The inclusion of artworks in building projects was a common practice in Canberra from the 1960s and reflected the policy of the NCDC. While the artworks on the external façade of the FCBB could be viewed as a relatively early and uncommon nongovernment example of incorporating artworks into the public space, this is a strongly qualified descriptor and thus does not meet the thresholds necessary to be considered for the ACT Heritage Register. Moreover, the original artworks have been

substantially modified reducing their expression of the original artistic narrative and materials. Thus, they no longer demonstrate the intactness/integrity necessary to meet the threshold for this criterion.

(c) potential to yield important information that will contribute to an understanding of the ACT's cultural or natural history;

The Council has assessed the Former Commonwealth Bank Building against criterion (c) and is not satisfied that the place meets this criterion.

There is no evidence before the Council that the building has the potential to yield information that will contribute significantly to a wider understanding of the cultural history of the ACT. Any information the place may provide has already been obtained from the documentary and physical evidence and it is unlikely that any further significant evidence could be gained from the physical fabric of the place.

(d) importance in demonstrating the principal characteristics of a class of cultural or natural places or objects;

The Council has assessed the Former Commonwealth Bank Building (FCBB) against criterion (d) and is not satisfied that the place meets this criterion.

The FCBB displays several features characteristic of the Late Twentieth Century International style. These key features include cubiform overall shape, structural frame expressed (by the columns and beams on the façade) and plain, smooth wall surface (at the splayed corner). Other features are external sun control devices (fins and louvres) and contrasting texture (between the stone cladding and the decorative panels). The expression of these characteristics on the façade of the place are relatively intact. However, there are other examples of this style in Canberra; it has not been shown that this building is comparatively distinctive or recognised (for example, by architectural awards) as important in Late Twentieth Century International architecture.

The FCBB is an example of a post-war and 1960s commercial building and there are some distinctive design features, such as the strong room, that are directly relevant to its use as a bank. However, there is no known type profile for either commercial or banking buildings as a class of place that would enable a meaningful assessment. The range of examples of such buildings in Canberra is also relatively large. In this context, it is not possible to assess any significant values at this time.

(e) importance in exhibiting particular aesthetic characteristics valued by the ACT community or a cultural group in the ACT;

The Council has assessed the Former Commonwealth Bank Building (FCBB) against criterion (e) and is not satisfied that the place meets this criterion.

The FCBB is an example of the Late Twentieth Century International style and is appreciated for aesthetic characteristics associated with this style by the architectural profession as represented by the Australia Institute of Architects (the Nominator). It also contributes to the urban environment in proximity to the Civic Square precinct. However, the Council does not consider the architectural community to be a cultural group for the purposes of this criterion. The Council's Heritage Assessment Policy interprets a cultural group as a 'group of people within a society with a shared ethnic or cultural background' or 'a group of people connected through the same way of living, which has been transmitted from one generation to another'. There is no

evidence that it is valued for in aesthetic characteristics by the wider ACT community or a cultural group.

(f) importance in demonstrating a high degree of creative or technical achievement for a particular period;

The Council has assessed the Former Commonwealth Bank Building (FCBB) against criterion (f) and is not satisfied that the place meets this criterion.

There are two elements of the FCBB that could be considered within the context of creative or technical achievements, the decorative panels and the use of the Celdek flooring system. However, neither achieve the high standards necessary for meeting the thresholds of this criterion.

The decorative panels by Mariti on the ground floor façade display creativity, being abstract in form and in keeping with the progressive architectural style of the building. However, neither the artist not the artworks themselves have been specially recognised for their artistic merit, such as being referenced in art publications. Their integrity has been affected by the loss of one panel, possibly two, and overpainting.

This building was possibly the first in Canberra to use Celdek cellular steel decking for the upper floor structures. The decking provided ducting for wiring and services, as well as a permanent formwork for the concrete floor slabs of the building. Limited historical information has been found about this flooring system, including the extent of its use in Canberra. However, it was being used in major and much larger multistory office buildings elsewhere in Australia, such as the AMP Building in Sydney from 1959. In this context, it does not appear that the use of the Celdek system represents a high degree of technical achievement.

(g) has a strong or special association with the ACT community, or a cultural group in the ACT for social, cultural or spiritual reasons;

The Council has assessed the Former Commonwealth Bank Building against criterion (g) and is not satisfied that the place meets this criterion.

Although the building was the branch of a major bank for over 50 years, including providing foreign currency exchange, there is no substantial research into, or evidence, of a strong or special association with the ACT community, or a cultural group in the ACT for social, cultural or spiritual reasons. The closure of the branch in 2020 seems to have passed without public comment or community concern.

(h) has a special association with the life or work of a person, or people, important to the history of the ACT.

The Council has assessed the Former Commonwealth Bank Building (FCBB) against criterion (h) and is not satisfied that the place meets this criterion.

The building could potentially be associated with the architects Peddle, Thorp and Walker, the artist responsible for the decorative panels, Silvano Mariti, and the Commonwealth Savings Bank of Australia.

Peddle, Thorp and Walker (now known as PTW Architects) are a prominent architectural firm that has a long history of practise in Australia since 1924. Designs, such as the AMP Building in Sydney (1962), have brought them much attention and they have received many design awards. In Canberra, Peddle, Thorp and Walker

designed the Swedish Embassy (a project undertaken in association with E G H Lundquist, 1951, and awarded the Sulman Medal in 1952), the Former Commonwealth Bank Building (1967), 221 London (former Electricity House, 1968), QT Canberra (former Lakeside International Hotel, 1972), and National Gallery of Australia extensions (1997 and 2010). However, in the case of the FCBB, there is nothing to suggest a special association with Peddle, Thorp and Walker: the building was not an early example of its work, it does not appear to be a seminal example and did not achieve wider acknowledgement such as through winning any design awards.

The panels on the façade of the FCBB are the only known examples in Canberra of the work of the artist Silvano Mariti. Outside of Canberra, Mariti appears to have made only modest artistic contributions in Sydney. He was not a prominently recognised artist, was not the focus of critical acclaim or attention, and his works of art are not represented in major collections. Consequently, Mariti is not considered an artist of note in the history of the ACT.

The FCBB was constructed to house the commercial operations of the Commonwealth Savings Bank of Australia, an entity that operated in the building from the time that it was opened in 1967 until its sale in 2020. However, the branch of the bank located nearby, on the corner of London Circuit and Northbourne Avenue, was earlier and its length of association at that location existed for a longer period of time.

SITE PLAN



Image 1 Former Commonwealth Bank Building site boundary. This corresponds to the cadastral boundary of block 2 section 13 City.