



ROYAL HISTORICAL SOCIETY OF VICTORIA INC.

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Royal Exhibition Building and Carlton Gardens Review,
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Submission to Review of the Draft Heritage Management Plan for the Royal Exhibition Building and Carlton Gardens

The RHSV, through its Heritage Committee, has carefully examined the Heritage Management Plan for the Royal Exhibition Building and Carlton Gardens, following our response to the World Heritage Environs Area Strategy Plan.

This submission in three parts:

- 1) the first concerns the draft Heritage Management Plan, read on its own terms, independently of the World Heritage Management Plan as a whole;
- 2) the second concerns the World Heritage Management Plan and the organisation of the review as a whole;
- 3) and the third concerns the problem of governance of the site as a whole and the need for a body tasked with the promotion and protection of the site in terms of its world heritage values.

Parts 2 and 3, it will be noted, go beyond the Management Plan itself, raising broader issues. We were assured at the information session on Tuesday 23 June that these issues should be included in this response. We believe, however, that as they go beyond the Plan, they should be considered by the steering committee and by Heritage Victoria. We are therefore sending this submission not only to the review address as indicated on the web site, but also to Amanda Bacon and Felicity Watson as members of the steering committee.

Part 1: Draft Heritage Management Plan

The new Heritage Management Plan seems to be a good advance on the current Conservation Management Plan. It covers what we might expect of a CMP for the Exhibition Buildings. We found the document to be reasonably comprehensive and we are not aware of any items that might

have been missed. It appears to be considerably more detailed and is arranged in such a way that it should be easy to find any topic on which guidance might be sought.

Part 2: Organisation of the World Heritage Management Plan and Review

The World Heritage Management Plan for the Royal Exhibition Building and Carlton Gardens is an unusual document. It is not really a plan at all but simply a pointer to other ‘attachments’ and it is in these ‘attachments’ that the substance of the ‘plan’ actually resides. Curiously, however, the current (2013) plan is not simply an index. It contains a summary of the heritage values that attach to the place at World, National and State levels, describes the Statutory Framework and lists the reporting and monitoring obligations. There is enough substance here to make one think one might find a plan buried in here somewhere but in fact there is none.

It appears that this same framework is to be retained for the new plan. We understand that the differing components of the site engender different responsibilities and hence different planning documents. Nevertheless, we are concerned that, on the one hand, this framework makes the review confusing and, on the other hand, it leaves no place for consideration of the site as a whole, a difficulty mirrored by the lack of any body whose mandate is to promote, protect and coordinate implementation of the plans for the site as a whole, a difficulty we address in Part 3, below.

The framework for the review is confusing. That each of the five major documents making up the overall Management Plan is presented as an ‘attachment’ leads the reader to assume that there is a main document to which each ‘attachment’ is attached. It is hard to tell which document is currently out for public consultation and where it was to be found, the more so in that the titles of the Plan and its ‘attachments’ are so similar and that the name of the document currently under discussion has been changed from ‘Conservation Management Plan’ to ‘Heritage Management Plan’ in order to comply with the terminology of the EPBC Act. So we have a Heritage Management Plan for a World Heritage listed place and a World Heritage Management Plan, each of which is a quite different document!

At the information session on Tuesday 23 June, the following diagram was shown, which explained the structure of the enterprise very well.



At the very least we would suggest that this diagram should appear at the beginning of each document so the reader is fully aware of where relevant document fits in.

We would, however, go further and suggest that the use of the word ‘attachment’ is not appropriate. It is easily misconstrued as an appendix of supporting data not necessary to the understanding of the plan. It is our view that the documents should simply be called ‘World Heritage Management Plan Part I, Part 2, Part 3, etc’ and the blue square perhaps labelled ‘Introduction’ and reserved for the purpose of explaining the overall structure and objectives of the complete document.

Part 3: Governance of the World Heritage Site

The UN manual, *Managing Cultural World Heritage*, suggests that ‘an effective institutional framework for heritage [must be] sufficiently defined in relation to the wider governance context’ and, further, that State Parties ‘must identify a single institution to act as the nodal point for all World Heritage matters and for communication with the World Heritage Centre’.¹

We are uncertain just what ‘single institution’ exists to comply with this requirement. Whatever it may be, however, it is clearly not a major component of the governance structures of the site. We believe that it is incumbent on the review as a whole to address this issue.

In our response to the WHEA Strategy Plan Discussion Paper, we argued as follows:

There is little point in setting up a WHEA if it does not have some place where the buck stops. It is totally pointless to expect that municipalities will give adequate protection to a site outside their boundaries. Their primary interest and indeed obligations are to their citizens and ratepayers. Even if the various DDOs applying across the WHEA were fully harmonised to include reference to the WHEA as per section 4 below, one could not count on the councils, as responsible authorities, to put the WHEA first, especially if the choice were between greater and lesser development, as it will often be.

This point applies to the site as a whole. We do not question the current arrangements in so far as they pertain to management of the Royal Exhibition Buildings and the Carlton Gardens. Museums Victoria has the expertise necessary to the operation and maintenance of the Exhibition Buildings. The City of Melbourne has an outstanding Parks and Gardens Department and is eminently qualified to maintain the Carlton Gardens.

That said, we believe that the review process should at some point address the question of whether the treatment of the site is sufficiently coherent. The Review Discussion Paper states that ‘Museums Victoria and City of Melbourne oversee the day-to-day management of the REB&CG’ (Review of the Royal Exhibition Building and Carlton Gardens World Heritage Management Plan Discussion Paper, p.10). That statement occludes the reality by conflating Museums Victoria and CoM as if they were a single entity. They are of course entirely distinct entities and the parts of the site which they manage stand in different positions in their administrative hierarchies. There is to be sure a Steering Committee, but it is not suggested that the Steering Committee plays a role in coordinating day-to-day management or even planning.

¹ *Managing Cultural World Heritage* (Paris: United Nations Educational, Scientific and Cultural Organization, 2013), pp. 71, 73.

Indeed, one could argue that the site is governed as three distinct parts: the southern and northern gardens, each managed by the CoM but at a different level of care and with very differing approaches to heritage and vistas, and the Exhibition Building itself, managed by Museums Victoria. Given this fact, it is, we believe, incumbent on the review process to address the issue of the coherence of the governance structures in advancing the heritage and tourist values of the site as a whole. What coordination is there between the treatment of the Museum forecourt and the surrounding gardens, for example?

Going further, we note that even if the governance structure did provide ‘a single institution’ of governance, there is no body that makes the promotion and protection of this World Heritage site its first priority. Neither Museums Victoria nor the City of Melbourne is structured or organised to do this, just as neither of two Councils responsible for the WHEA is set up to make the World Heritage site its first priority when considering planning issues in the WHEA.

In our response to the WHEA Strategy Plan Discussion Paper, we argued for inclusion in all relevant planning controls of a trigger for referral to the Executive Director, Heritage Victoria. Making the ED a determining referral authority for the WHEA is the most realistic, indeed the only workable option that will achieve consistent state level control of the area.

This, however, does not address the fundamental issue we confront with the current review and with the ensemble of reviews comprising the World Heritage Management Plan. There is a pressing need for a body whose sole responsibility is to protect and promote the site. The Plan is a doughnut whose hole needs to be filled.

We are not suggesting a trust or other body to operate the Exhibition Buildings or the Carlton Gardens, but rather a body which sees its mission as promoting the site, coordinating the component bodies and leading the charge for protection and improvement of the site as a whole, considered in world heritage terms. The interim report of the review of the EPBC Act 1999 by Professor Graeme Samuels called for ‘a strong, independent cop on the beat’, ‘an independent compliance and enforcement regulator that is not subject to actual or implied direction from the Commonwealth Minister’.

We believe that a similar approach is needed here. What we are advocating is not so much a regulator, but rather an advocate and coordinator whose mission is to ensure compliance with world heritage values and development and protection of the site on that basis. This body might be called ‘The Exhibition Buildings World Heritage Authority’. This Authority would be tasked with harmonising and coordinating planning. It would have the legal power to refer issues to the appropriate authority, the Heritage Council for issues of preservation of the site and the Executive Director, Heritage Victoria, for issues of planning.

We call on the steering committee to consider urgently these issues of governance, which transcend the component parts of the review and of the site as it is presently governed.

This submission was prepared on behalf of the Royal Historical Society of Victoria by Mr Ian Wight MICOMOS and the Chair of the RHSV Heritage Committee, Professor Charles Sowerwine. Please direct any queries to Professor Sowerwine c.sowerwine@gmail.com /tel. 0414 250-046.