



## ROYAL HISTORICAL SOCIETY OF VICTORIA INC.

239 A'Beckett Street, Melbourne 3000

26 February 2021

Dr. Mechtild Rössler, Director,  
World Heritage Centre, UNESCO  
7, Place de Fontenoy,  
75352 Paris CEDEX 07,  
France.

Dear Dr Rössler,

### Erosion of Protection Royal Exhibition Building and Carlton Gardens World Heritage Site

The Royal Historical Society of Victoria, founded in 1909, functions both as the peak body for 340 local history societies across the state of Victoria (Australia) and as the local historical society for its capital Melbourne. In the first capacity, the RHSV seeks to support the conservation of valuable built heritage across the state. In the second, the Society seeks to preserve the remaining heritage of the City.

We write to inform you of our concerns at the erosion of protection for the Royal Exhibition Building and Carlton Gardens (REB&CG) World Heritage site. In short, the protection promised when UNESCO agreed to this nomination has been severely compromised, resulting in significant ongoing threats to the site's world heritage values.

In its efforts to secure World Heritage listing, the Australian Government, in its response to the ICOMOS Report on the site's nomination for World Heritage listing, noted that not only were the REB & CG protected, but also that 'any action which may have a significant impact on a world heritage property, *whether inside or outside the boundaries* of the property, is prohibited [emphasis original]'. It further noted that 'all planning policies in these [i.e. the surrounding] areas discourage the demolition of Victorian-era buildings and require any development to enhance heritage values. These provisions would also apply to any redevelopment of existing modern buildings around the site, **including the southern Central Business District area** [emphasis added]'.

The Australian Government, moreover, promised that 'the State Minister for Planning intends to enact a special provision to establish a formal buffer zone around the site' and included a map showing a 'probable configuration' of the buffer zone. That map, Map 1 (be-

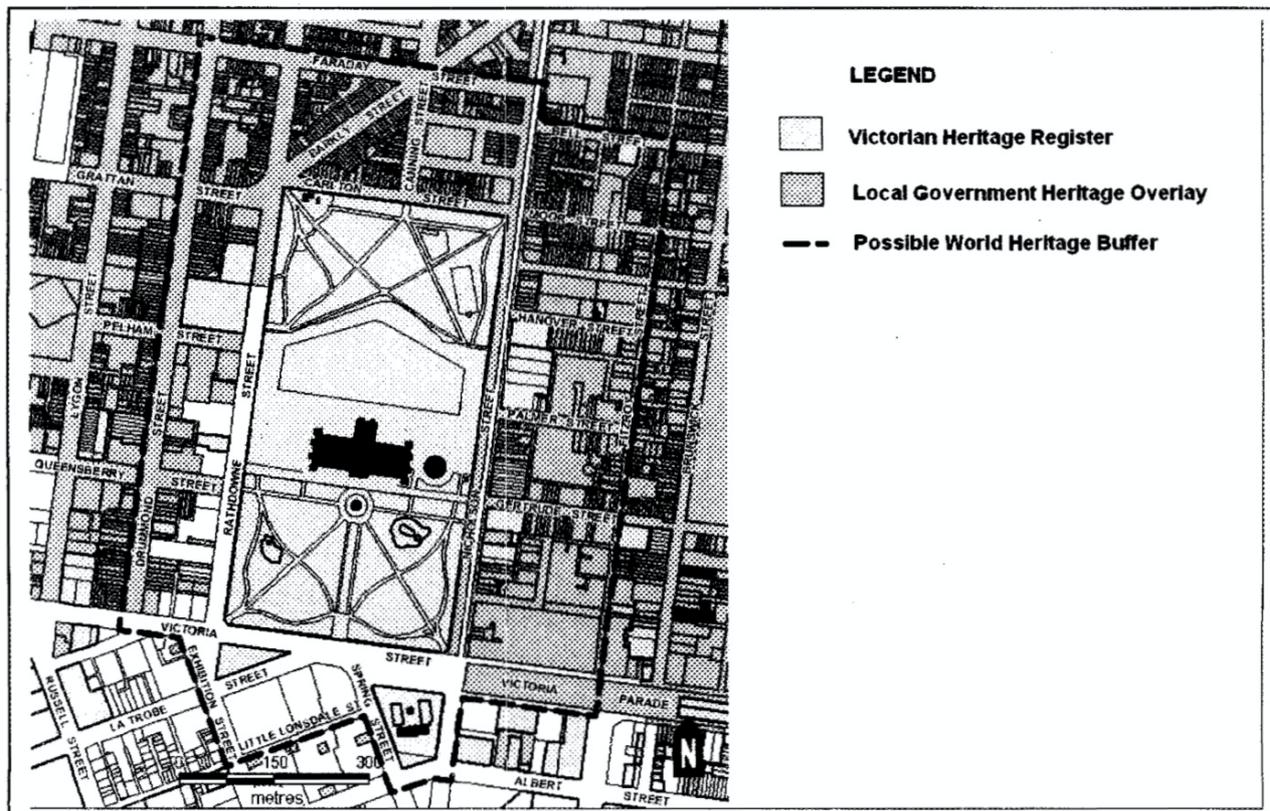
Tel: +613 9326 9288 Find out more about us on our website [www.historyvictoria.org.au](http://www.historyvictoria.org.au)

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low), indicated clearly the inclusion in the buffer zone of the block south of La Trobe Street bounded by Spring, Little Lonsdale and Exhibition streets.<sup>1</sup>

**Map 1. Royal Exhibition Building and Carlton Gardens and surrounds, indicating areas protected under the Heritage Act 1995, Heritage Overlay and possible buffer zone.**



Subsequently, despite these promises, the buffer zone was divided into an ‘Area of Greater Sensitivity’ and the remainder of the WHEA, left in effect as an area of lesser sensitivity. ‘WHEA Boundary’ (appended below) shows the WHEA as originally agreed and the ‘Area of Greater Sensitivity’.

It is important to note that only the ‘Area of Greater Sensitivity’ enjoys heritage planning controls protecting the world heritage values of the site. The rest of the WHEA is essentially under the same planning regime as nearby areas.

As a result, there have been serious inroads into the world heritage values of the site. These are detailed in the *Review of the World Heritage Strategy Plan for the Royal Exhibition Building & Carlton Gardens World Heritage Environs Area*, Discussion Paper Prepared by Hansen Partnership Pty Ltd in partnership with HLCD Pty Ltd for the Department of Environment, Land, Water & Planning, April 2020, a copy of which accompanies this letter.

The Discussion Paper clearly sets out (pp. 61-62) substantial incursions of high-rise buildings have already occurred in the southern Central Business District area, where it was originally promised that ‘all planning policies in these [i.e. the surrounding] areas discourage the

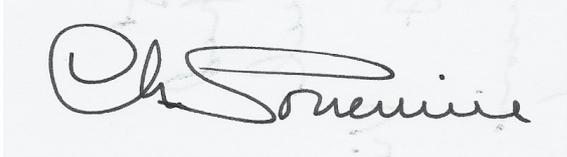
<sup>1</sup> ‘Australian Government Response to the ICOMOS Assessment Report on the Royal Exhibition Building & Carlton Gardens World Heritage Nomination’, 9 June 2004, <https://whc.unesco.org/uploads/nominations/1131bis.pdf>, pp. 12, 13.

demolition of Victorian-era buildings and require any development to enhance heritage values'. Some of these incursions are within the WHEA area.

Now there are further threats, including a 54 m glass-faced block directly across Nicholson Street from the Carlton Gardens (Yarra City Council PLN20/0567—27-41 Victoria Pde), an area that, while in the WHEA and within the promised buffer zone, is not in the 'Area of Greater Sensitivity' and thus is being subject to little scrutiny in terms of its threat to world heritage values. A further threat is a proposed five-storey development which risks views to and from the nearby dome (Yarra City Council PLN20/0566—1-9 Gertrude St).

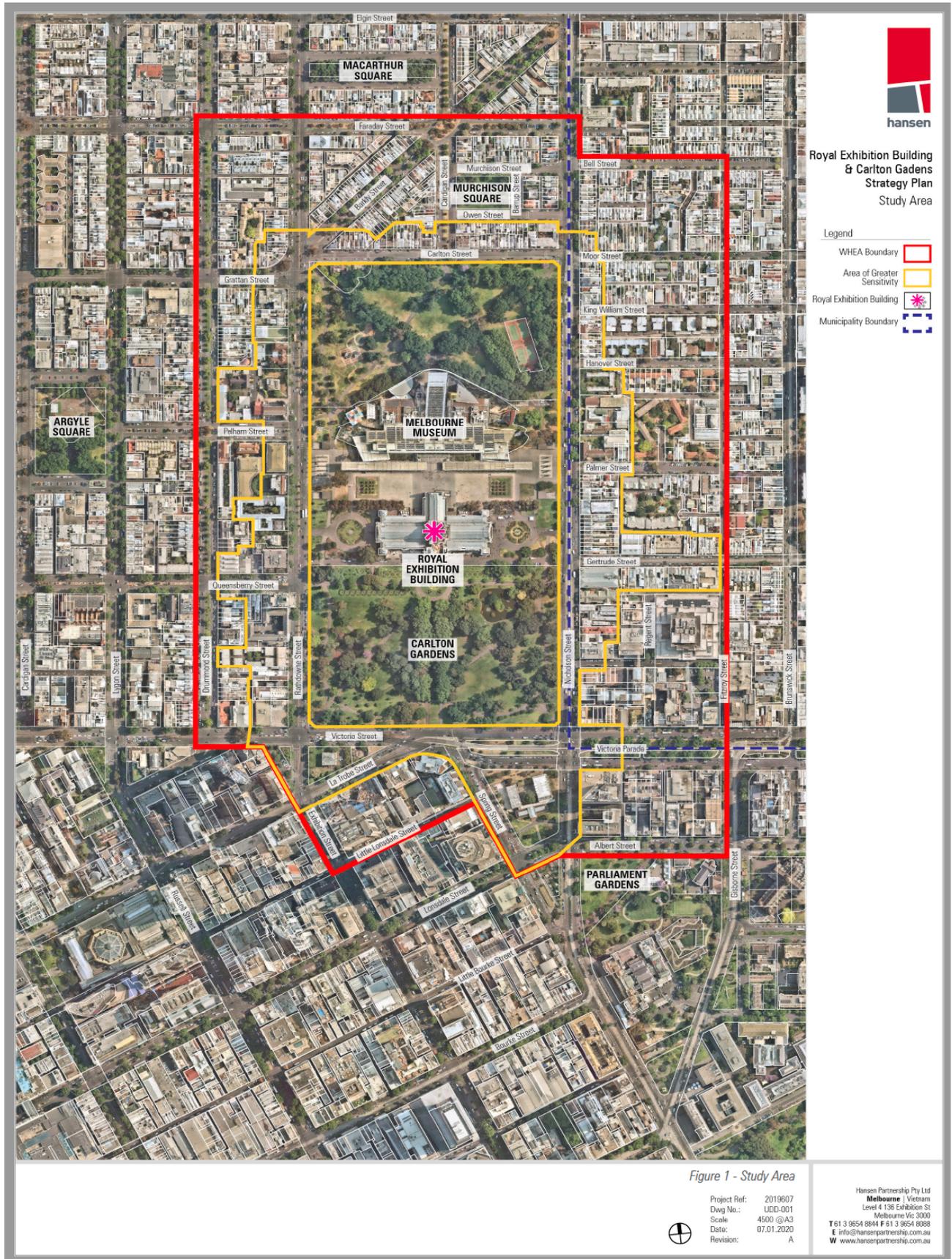
We call on UNESCO to query the Australian government over its failure to protect environs of this world heritage site as originally promised and ask the government to rectify the serious deficiencies of the controls currently in place.

Yours faithfully,

A handwritten signature in black ink on a light grey background. The signature is cursive and reads "Ch Sowerwine".

(Professor) Charles Sowerwine FAHA,  
Chair, Heritage Committee,  
Royal Historical Society of Victoria.

Accompanying document: *Review of the World Heritage Strategy Plan for the Royal Exhibition Building & Carlton Gardens World Heritage Environs Area*, Discussion Paper Prepared by Hansen Partnership Pty Ltd in partnership with HLCD Pty Ltd for the Department of Environment, Land, Water & Planning [State of Victoria], April 2020.



WHEA Boundary (red line) and ‘Area of Greater Sensitivity’ (yellow line). Figure 1, Review of the World Heritage Strategy Plan for the Royal Exhibition Building & Carlton Gardens World Heritage Environs Area, Discussion Paper Prepared by Hansen Partnership Pty Ltd in partnership with HLCD Pty Ltd for the Department of Environment, Land, Water & Planning, April 2020