



ROYAL HISTORICAL SOCIETY OF VICTORIA INC.

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Submission to Royal Exhibition Building and Carlton Gardens Review

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1) Introduction

The RHSV, through its Heritage Committee, has carefully examined the various documents associated with the Royal Exhibition Building and Carlton Gardens Review. In general, we applaud the *Overview* Review paper presently under discussion. We believe, however, that it falls far short of what is needed and we note that as it forms only part of the review, the issues overflow beyond what it can deal with.

The review process is appallingly fragmented and confusing. As the Review notes (pp. 71-72), this "contributes to complexity in site management and increases the risk of inconsistency or confusion when making management decisions." On the "engage" page, the review is listed as the Royal Exhibition Building and Carlton Gardens Review, but to make a submission it is "Have your say on the World Heritage Management Plan." The title page of the *Overview* refers to it as the "Royal Exhibition Building & Carlton Gardens World Heritage Management Plan," with a sub-title "Part 1 of 5: Overview Site Management Plan." The *Overview* is the first of five parts! We at the RHSV have responded and submitted to a number of reviews, including the WHEA, the Heritage Management Plan, and the Steering Committee Strategic Vision.

This fragmentation bodes ill for producing a coherent response to the dangers threatening Melbourne's World Heritage site. And it is an apt symbol of the structural problems that have allowed significant deterioration of the WH site since it was listed with UNESCO. The grave losses that have already been incurred through fragmentation of authority and of planning as well as the future threats to the WH site were clearly identified in the Hansen Partnership Review of the Strategy Plan Discussion Paper (April 2020, pp. 59-60). We respectfully but urgently suggest, therefore, that this part of the Review, which looks to be the wrap-up of this whole process, focus on governance and coherence of planning controls.

Following a brief presentation of the RHSV and its position as a stakeholder in the REB site, we set forth four sets of recommendations.

2) The Royal Historical Society of Victoria and the REB/CG Site

The Royal Historical Society of Victoria (RHSV) has been a partner and a key stakeholder with the city's governing authority, the City of Melbourne, since the Society's inception in 1909. It functions both as the peak body for 340 local history societies across Victoria and as the historical society for central Melbourne. In the first capacity, the RHSV seeks to support the conservation of heritage across the state, including its capital city Melbourne. In the second, the Society seeks to preserve, promote and capitalise on the heritage of the city and its inner area.

The RHSV is thus doubly a stakeholder in any discussions concerning the protection of the World Heritage site, and the World Heritage Environs Area (WHEA) or 'buffer zone', the most significant heritage precinct in all of Melbourne and indeed of Victoria.

The significance of this site, taken as a whole—the Royal Exhibition Building, the Carlton Gardens, and the environs, still largely suggestive of the kinds of built forms predominating at the time of the 1880 Exhibition—cannot be overestimated. 'There is nothing like it anywhere else in the world today', wrote the eminent UK historian, Professor David Cannadine.¹ As the Australian Government Response to the ICOMOS Assessment Report put it in 2004: 'The Royal Exhibition Building in its original garden setting is the most authentic remaining example of an *in situ* Palace of Industry from a significant international exhibition.'²

The task of the Review is thus of the greatest significance for Melbourne's most significant heritage site and tourist attraction, its only World Heritage site.

We believe that **Objective 3** is the key to ensuring that the site is protected and fulfils its potential to contribute to the development of cultural tourism in Melbourne. Objective 3 is to 'Ensure collaborative and coherent site management, including management of the World Heritage Environs Area "buffer zone", in accordance with the World Heritage Management Plan.' And the key to achieving Objective 3 lies in the phrase, 'take a collaborative approach to decision making'. We understand this to mean that, in instances that 'have the potential to affect the site's Outstanding Universal Value'—which is the fundamental basis for realising the site's potential—the Steering Committee would collaborate with the relevant responsible authorities.

To initiate such collaboration would be a decision taken by the Committee or by the Executive Director Heritage Victoria if in their view a proposal or action had the potential to threaten the site's Outstanding Universal Value.

¹ '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>, p. 2.

² *Ibid.*

3) Governance—“A Single Institution?”

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’.³

It has become increasingly apparent through this review process that no ‘single institution’ exists to comply with this requirement. 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.

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 address and make effective suggestions to move toward a “single institution” that could take on responsibility for ensuring coordination between the various authorities, especially in regard to protection of the site. 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.

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 the 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.

³ *Managing Cultural World Heritage* (Paris: United Nations Educational, Scientific and Cultural Organization, 2013), pp. 71, 73.

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. This is essential to meet “Objective 1— Advocate for the conservation and enhancement of the property’s Outstanding Universal Value,” which we strongly endorse.

Given the significance of the site and Australia’s international obligations to protect and enhance it, a strong Steering Committee actively engaged in a collaborative approach to the management of the site is urgently required.

We believe that the Steering Committee should have:

- broader responsibilities to guard, guide and promote this iconic world heritage site,
- dedicated personnel, and
- an independent budget commensurate with the extent and importance of its responsibilities.

This last point is crucial. The Steering Committee, if that is what the single institution is called, would require a steady stream of finances. We strongly endorse the conclusion of the Review, 5.5.1, “Appropriate resourcing, both financial and staffing, is essential to the effective conservation, maintenance and management of the REB and CG.” What is not entirely clear is that this resourcing is crucial for the expanded role we are urging for the steering committee. We urge that this resourcing be linked to a proposal for a single institution to address Objective 1.

We call on the review 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.

4) Governance—Steering Committee

To ensure that the committee has the capacity to act in a timely fashion and to have appropriate impact through its actions, we submit that the committee structure needs to be improved. As a first step, we strongly support the stated aim ‘explore the feasibility of enabling all members appointed in accordance with the Heritage Act to vote on Steering Committee matters’. This would translate into giving full voting rights to the current non-voting members, the National Trust of Australia

(Victoria) and the City of Yarra, and to any subsequent additional members. That is, in our view, essential.

We submit in addition that broader representation is urgently required to strengthen the Steering Committee by incorporating a much greater range of public representatives with responsibility for the site as well as community representatives with appropriate expertise. We suggest adding to the Committee representatives from:

- 1) **The Australian Government**, presumably the Minister for the Environment, so long as the World Heritage site remains in this portfolio. The Review makes the point cogently that the Australian government is ultimately responsible for the World Heritage site, having signed the international commitments in this regard. That responsibility calls for there to be more than just ‘occasional attendance’. The ministry where necessary the minister should be alerted to issues as they develop and in turn should keep the steering committee abreast of national and international developments that have potential to impact the World Heritage site.
- 2) **The Victorian Minister for Planning**. While the responsible authorities for planning within the WHEA (the City of Melbourne and the City of Yarra) are on the committee, the Minister for Planning, to whom the most thorny planning issues often fall, is not. The Minister’s delegate would be a voice from the committee and in addition and importantly a voice to the Minister.
- 3) **The Chair of Visit Victoria**. The importance of Melbourne’s only World Heritage attraction to cultural tourism and the significance of cultural tourism mean that the preservation and promotion of the REB/CG is vital to this important industry. And this industry has a stake in the preservation and enhancement of the site. This would be a voice for developing the tourist potential of the site.
- 4) **Representatives of community stakeholder organisations**. The committee at present does not have representatives with a primary focus on promoting the World Heritage values and tourist potential of the REB/CG. They would be best placed to bring potential threats to the committee’s attention and to keep it focussed on the fundamental issues. There are a number of community groups which have such a focus and the requisite expertise; this sector should be represented on the committee. They should have full voting rights if that is feasible within the terms of the legislation.

Among the groups which should be considered in this regard, a preliminary list would include the Carlton Association, the Fitzroy Residents’ Association, the Friends of the Royal Botanic Gardens, the Fitzroy Historical Association and the RHSV. We do not suggest that all these groups should be included or even that all would necessarily wish to provide a representative, but that these are the kinds of groups that should be canvassed. In view of the number of groups which would potentially be interested, the positions should be advertised and the representatives selected on the basis of their record as advocates for the World Heritage site, the strength and expertise of their organisation and the extent of their community ties.

The Royal Historical Society of Victoria would, in the case such a measure were adopted, apply for membership and would, we believe, have a strong case. The RHSV, as stated above, has been active in the preservation, commemoration and promotion of heritage throughout Victoria since its founding in 1909. As the historical society active in the Hoddle Grid area, it has played an essential role in protecting Melbourne’s heritage and history as well as in promoting history and cultural tourism. On the Steering Committee, it would be an effective voice for preservation with a view to promoting cultural history and tourism.

Such a strengthened and more representative Steering Committee would be better able to further the aim of ‘unified management of the site in areas that affect or have the potential to affect the site’s Outstanding Universal Value’. Achieving that aim is crucial to the future of the site and its role in the development of Melbourne as a cultural tourism destination.

5) Executive Director, Heritage Victoria to be a Referral Authority

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.

We do not need to elaborate further on this because the “Review of the World Heritage Strategy Plan for the Royal Exhibition Building & Carlton Gardens World Heritage Environs Area” (May 2021) made this point most effectively (9.6 Executive Director, Heritage Victoria Implemented as a Referral Authority, p. 98) and we need only refer to their recommendation and state our absolute commitment to it. The Review carefully notes the various planning amendments required and we need only express our approval of its recommendations in this regard. We should, however, point out that we support the inclusion of a trigger for referral so as to avoid unnecessary referral and we most emphatically support the trigger as proposed in the Review: “An application for all new buildings 3 storeys/11m or greater in height, or additions to an existing building which would increase its height to 3 storeys/11m or more” would trigger referral to the Executive Director, Heritage Victoria, as a determining authority.

The importance of this measure cannot be overstated.

6) Conclusion

It should be clear that the Royal Historical Society of Victoria strongly supports the direction of the *Overview* Review, but wishes for greater action on several fronts, particularly:

- Significant strengthening of the Steering Committee so as to create a fully-funded ‘single institution’ (in the UNESCO meaning of the term), centralising and overview of the REB & CG WH site, as specified above (3) Governance—‘A Single Institution?’
- Major reform of the steering committee by the inclusion of new members, as specified above (4) Governance—Steering Committee.
- Making the Executive Director, Heritage Victoria, a determining referral authority for the WHEA, with a trigger for referral as per the May 2021 Review recommendation 9.6, as specified above 5) Executive Director, Heritage Victoria to be a Referral Authority.

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