

Review of the Royal Exhibition Building and Carlton Gardens World Heritage Management Plan

Community consultation summary report



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Acknowledgment

We acknowledge and respect Victorian Traditional Owners as the original custodians of Victoria's land and waters, their unique ability to care for Country and deep spiritual connection to it. We honour Elders past and present whose knowledge and wisdom has ensured the continuation of culture and traditional practices.

We are committed to genuinely partner, and meaningfully engage, with Victoria's Traditional Owners and Aboriginal communities to support the protection of Country, the maintenance of spiritual and cultural practices and their broader aspirations in the 21st century and beyond.



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1. Introduction

1.1 About the World Heritage Management Plan for the Royal Exhibition Building and Carlton Gardens

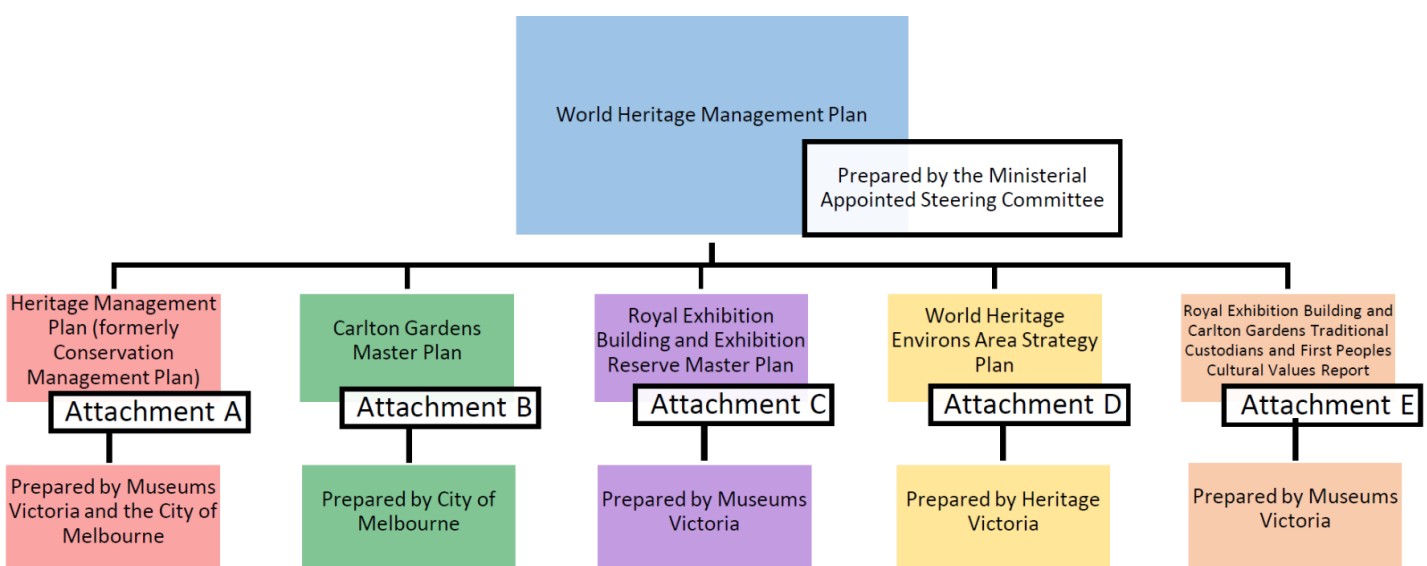
The Royal Exhibition Building and Carlton Gardens ('REB&CG') is a World Heritage Listed site. The REB&CG was inscribed on the United Nations Educational, Scientific and Cultural Organisation ('UNESCO') World Heritage list in 2004, as the oldest surviving nineteenth century Exhibition-era building in its original setting still operating as an exhibition hall. It is one of only two World Heritage sites in Victoria (the second being Budj Bim Cultural Landscape, inscribed in 2019). It is also included in the National Heritage List and Victorian Heritage Register.

As a World Heritage Listed site, management of the REB&CG is guided by a *World Heritage Management Plan*. The current *World Heritage Management Plan* comprises one overarching document, with four attachment documents forming Attachments A – D (see **Figure 1**). An additional document is currently in preparation, and once complete will form Attachment E¹ to the reviewed World Heritage Management Plan (see **Figure 1**). Attachment E will document the engagement with First Peoples to identify the Aboriginal and Torres Strait Islander cultural heritage values of the site, ensuring these values are appropriately identified and managed. Together, the attachment documents contribute to the successful management, protection and promotion of the World Heritage values of the site and ensure that the REB&CG is enjoyed for many generations to come.

The overarching *World Heritage Management Plan* is prepared by a Ministerial appointed Steering Committee for the site ('the Steering Committee') and the attachment documents are prepared and implemented by the three agencies responsible for the management of the REB&CG site and the World Heritage Environs Area ('WHEA') surrounding it:

- The City of Melbourne;
- Heritage Victoria; and
- Museums Victoria.

Figure 1: World Heritage Management Plan attachments and responsible agencies



¹ At the time of publishing this report, Attachment E was in preparation and as such has no formal title. The title outlined in Figure 1 is suggested only and is subject to change.

All three responsible agencies are represented on the Steering Committee, in addition to the City of Yarra and the National Trust of Australia (Victoria). Commencing in 2020, the Steering Committee is undertaking a coordinated review of the *World Heritage Management Plan* for the REB&CG.

For more information on the attachment documents, management and governance of the site, please see the 'Overview of Governance' section of the review [Discussion Paper](#).

1.2 About the review process

In accordance with Part 9, section 191 of the *Heritage Act 2017*, a *World Heritage Management Plan* for a World Heritage Listed place must be reviewed every seven years. The current *World Heritage Management Plan* for the REB&CG was last approved in 2013 and is therefore due for review in 2020.

On 1 June 2020 the review process commenced with the launch of a two-month community consultation period using the Engage Victoria website. This marked the first stage of the review and during this time members of the public could respond to an online survey, provide comments on an interactive map of the site, or upload a written submission.

The two months between June 1 and July 27 also involved a letterbox drop to 2770 occupiers within the area surrounding the REB&CG, a virtual interactive forum, two social media campaigns and on-site signage at the REB&CG promoting the review.

The intention of this first stage of community consultation was to understand community views in relation to aspects of site management that are currently working, not working or need improvement. It was also an opportunity to understand what members of the public value about the site, what they think is important to protect, and how they imagine the site in the future.

All feedback received will inform the review of the *World Heritage Management Plan* and attachment documents.

As the review continues throughout 2020 and 2021, each of the attachment documents will be reviewed and made publicly available on the Engage Victoria website. There will be an opportunity for members of the public to comment on each document as it becomes available.

It should be noted that the draft review of the *Heritage Management Plan* (Attachment A, formerly *Conservation Management Plan*) was publicly advertised on the Engage Victoria website between June and July 2020. Submissions received in relation to this document have been provided to Museums Victoria and the City of Melbourne, the agencies responsible for coordinating the review of this document. As such, submissions relating to the *Heritage Management Plan* have not been summarised here.

Additionally, the *World Heritage Strategy Plan* for the WHEA surrounding the REB&CG (Attachment D) is currently under review, with Hansen Partnership Pty Ltd, in partnership with HLCD Pty Ltd, coordinating this process on behalf of the Executive Director, Heritage Victoria. A discussion paper relating to the review of the *World Heritage Strategy Plan* was circulated to key stakeholders in April 2020, but did not form part of the community consultation undertaken between 1 June and 27 July.² Therefore, feedback submitted in response to the aforementioned discussion paper has not been summarised in this report, although general feedback relating to the

² Note that, once complete, the draft of the *World Heritage Strategy Plan* will be available for public submissions in accordance with section 171 of the *Heritage Act 2017*.

management of the WHEA provided during the two-month community consultation has been included.

Additional consultation reports may be published on the Engage Victoria website once the remaining draft documents have been reviewed.

1.3 About this consultation summary report

This document summarises community feedback received during the community consultation period between 1 June and 27 July 2020.

The Engage Victoria website for the project (<https://engage.vic.gov.au/rebcgreview>) was viewed 4,833 times and a total of 506 contributions were made during this time. These contributions comprised 194 survey responses, 297 comments on the interactive map and 15 written submissions. Additionally, 37 people attended the virtual interactive forum and asked a total of 32 questions. These questions were responded to by a panel of representatives from each of the responsible agencies.

This document identifies and summarises key issues and themes that emerged from responses and submissions made during the community consultation period. It should be noted that the acknowledgement of a response or submission, including any direct quotation, does not imply support or weight given to that response or submission.

This report divides submissions and responses into the following four categories, and summarises each category accordingly:

- a) Attendance and questions asked at the virtual interactive forum (see **section 2.1**);
- b) Comments made on the interactive map of the REB&CG site (see **section 2.2**);
- c) Multiple choice and free-text responses to the online survey questions (see **section 2.3**); and
- d) Written submissions (see **section 2.4**).

The Steering Committee would like to thank all contributors for their valuable input.



2. Key Findings

2.1 Summary of virtual interactive forum

A virtual interactive forum was streamed live on YouTube on Tuesday 23 June, 1-2pm. The forum was hosted by a panel of representatives from Heritage Victoria, Museums Victoria and the City of Melbourne. The panellists spoke about the roles of each organisation in the day-to-day management of the REB&CG and about the purpose of the World Heritage Management Plan and attachment documents. Panellists also spoke about the purpose and intention of the review process and emphasised the importance of hearing from members of the public throughout the review.

Participants were required to register before the forum and had an opportunity to ask questions of the panel before or during the event. There were 39 registrations, 32 questions asked and a total of 37 participants who watched the event live. The panel answered questions live and all questions were answered following the event and posted on the Engage Victoria website along with a recording of the forum.

The 32 questions asked of the panel covered a wide range of topics and themes, chiefly relating to the day-to-day management of, and access to, the REB&CG; the current governance model for the site; how the site's State, National and World Heritage values are managed; and statutory controls that apply to the REB&CG and surrounding WHEA.

To watch the forum, and to read a summary of the questions asked and answers provided during the forum, please visit the Engage Victoria website at <https://engage.vic.gov.au/rebcgreview/infosession>

The Steering Committee would like to thank all forum participants for their attendance, and for all questions received.

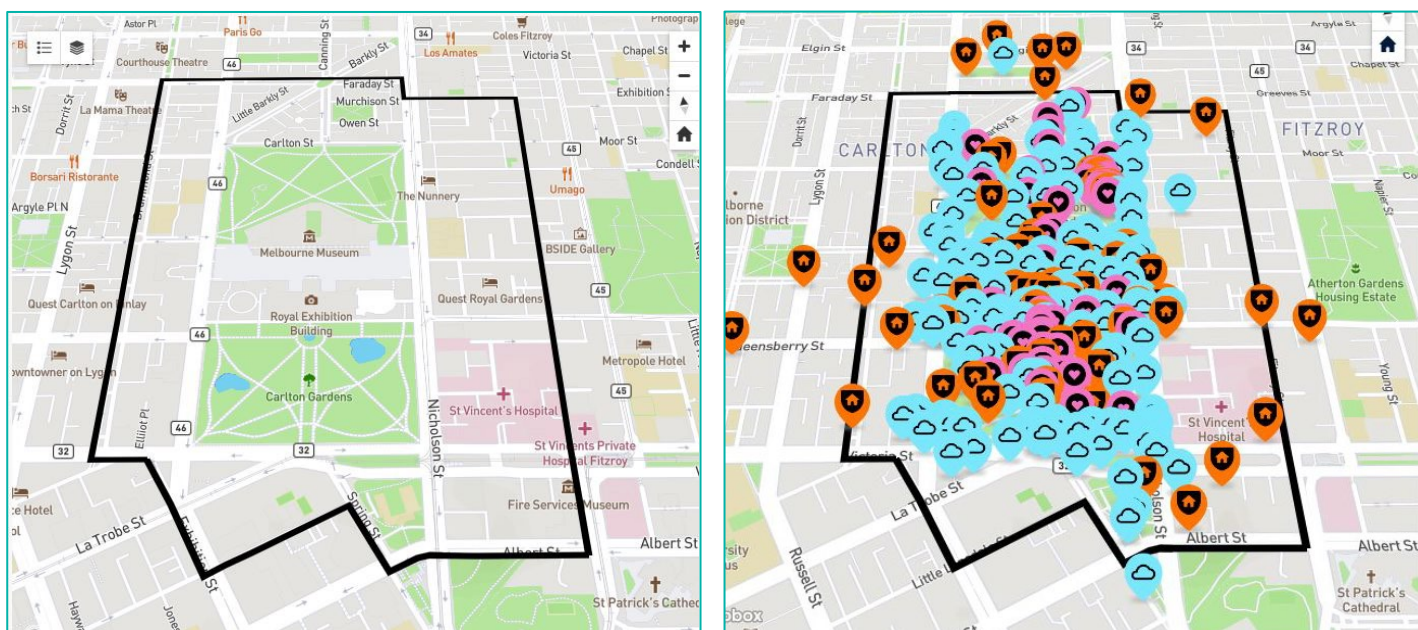


2.2 Interactive Map results

Using an aerial map of the REB&CG (please refer to **Figure 2**) participants were asked to provide answers to one or more of three questions:

- What do you love about the place?
- What do you think is important to protect at the place?
- How do you imagine the place in the future?

Figure 2: Screenshots showing how the interactive map appeared on Engage Victoria before comments were received (left) and after 297 comments were received (right).



2.2.1 Royal Exhibition Building

What people like

- Restoration work to the building and dome and future public accessibility to the dome promenade
- The ability to see events and artwork in such a unique and grand space
- The iconic nature of the building and the view corridor up the avenue of plane trees
- The entire site as a space for reflection, inspiration and pride

What people don't like

- Hard surfacing surrounding the building
- Public amenities including carparking and rubbish bins so close to the building
- The lack of useability of the forecourt between the Melbourne Museum and Royal Exhibition Building
- Event advertising banners being displayed on the building

What many people want

- Increased green space and useability of forecourt between the Melbourne Museum and Royal Exhibition Building
- Protection with a focus on the building's context into the future
- Removal of carparking near and surrounding the building

2.2.2 Carlton Gardens

What people like:

- Mature avenues of trees for shade and visual appeal
- The varied wildlife and biodiversity found around the lakes and gardens
- The beautiful green space so close to the Melbourne CBD
- Feeling connected to the Melbourne community when using the space for recreation, walking and relaxing

What people don't like:

- The hard-surfaced areas around the site (concrete, bitumen, asphalt, paved paths)
- Poor quality hard surfacing which may be hazardous to pedestrians and cyclists
- Poor water quality in the lakes and dangerous surrounding path
- Bright lights within the garden causing light pollution

What many people want:

- Native planting within and surrounding the gardens
- Planting to block the noise and view of the busy surrounds
- Less hard surfacing, and replacement with greenery
- A grander entrance by re-instating the historic fence and gates
- Interpretation signage and tree identification signs

2.2.3 World Heritage Environs Area (WHEA) and surrounding development

What people like

- Protection of buildings from various eras in the surrounding area
- The view of the Royal Exhibition Building from the surrounding area

What people don't like

- The volume and type of new developments occurring in the surrounding area
- Concern that degradation of the WHEA is occurring and that it is no-longer fulfilling its purpose

What many people want

- An extension of the WHEA in all directions to include Gertrude Street, Brunswick Street, Lygon Street and Elgin Street
- An emphasis on public open spaces leading to the Royal Exhibition Building, particularly around Spring Street
- Activation, enhancement and protection of some buildings in the surrounding area including the Cable Tram House, the former Cancer Council Building (corner of Rathdowne and Victoria Streets), and Freethought Hall (Victoria Parade)
- Allowance for mixed-use zoning to encourage activation of the surrounding area

- Planning controls to protect the built environment of the surrounding area and avoid over-development

2.2.4 Recreational use and events

What people like

- Using the site as a respite from the busy CBD
- The Carlton Gardens Tennis Club and its long-standing place in the Melbourne community
- Continued use of the building as an exhibition space and attending events there (White Night, Finders Keepers Market, Melbourne International Flower and Garden Show (MIFGS) were specifically mentioned)

What people don't like

- Skateboarding causing noise pollution and destruction to built fabric
- The state of the children's playground
- The Carlton Gardens being closed off to the public for major events
- The damage some major events may cause to the Carlton Gardens

What many people want

- Further consideration into the impact of the MIFGS on the Carlton Gardens and the public when access is restricted
- Potentially re-locating MIFGS to avoid damage to the Carlton Gardens
- Allowing commuters through the Carlton Gardens when MIFGS is on
- A designated skatepark
- A designated off-leash area for dog walkers

2.2.5 Pedestrian and cycling access to and from the Royal Exhibition Building and Carlton Gardens

What people like

- The pedestrian-only areas of the Carlton Gardens
- Feeling safe on paths where cycling access is restricted

What people don't like

- Pedestrian access to and from the site is difficult, dangerous and unsuitable for large events
- Restricted cycling access within the Carlton Gardens makes commuting through the area difficult
- Shared pedestrian and cycling paths surrounding the site are degraded and dangerous
- The pedestrian light cycle at the Victoria Street entrance is too short making it difficult to cross
- Access to and from the site is difficult for mobility impaired users
- Parking and ramps for mobility-impaired users being blocked by event vehicles
- Feeling as though the site is cut-off from the Melbourne CBD by the heavy traffic on all sides

What many people want

- Easier, welcoming, safer and accessible entrance points to the site from the Melbourne CBD
- Better linkage of the site to the Melbourne CBD
- Dedicated cycling paths within the Carlton Gardens to allow for greater connectivity between roads
- Upgrades to the pedestrian and bicycle paths with signage indicating dedicated bike paths
- Retain restricted bicycle access within the Carlton Gardens to ensure passive recreation continues



2.3 Survey results

The intention of the online survey was to capture wide-ranging information about how the REB&CG is accessed and used by the public, and to understand the public's views in relation to how the World Heritage site is managed.

The survey was divided into six themed sections with a mix of 23 multiple choice and free-text questions relating to the management of the site, its public use and access, and the protection of the surrounding WHEA.

A total of **194** people completed the survey on the Engage Victoria website. The following section summarises the results of all survey responses received.

2.3.1 Survey question summary

Theme 1: A place that conserves history and cultural heritage

Overall, answers to questions under this theme indicate that the public generally agree that the site is well-conserved, well-maintained and accessible to the public. No respondents strongly disagreed with these statements.

Q1 The Royal Exhibition Building is well-conserved and accessible to the public.

Participants who answered this question: 186
Strongly agree: 40.32%
Agree: **43.01%**
Neutral: 9.14%
Disagree: 7.53%
Strongly disagree: 0%

Q2 The historic gardens of the REB&CG site are well-maintained and accessible to the public.

Participants who answered this question: 186
Strongly agree: **55.91%**
Agree: 33.87%
Neutral: 5.38%
Disagree: 7.53%
Strongly disagree: 0%

Theme 2: A place protected for the people

The majority of respondents to questions in this theme agreed that the site allows for an appropriate balance of passive and active activities, and there was overall agreement that the events and exhibitions held at the site are appropriate to its setting. However, a small portion of respondents strongly disagreed to both statements.

Q3 The REB&CG site allows for an appropriate balance of passive (such as reading, relaxing, picnic) and active (basketball, tennis, play, cycling) activities.

Participants who answered this question: 186
Strongly agree: 39.25%
Agree: **40.32%**
Neutral: 7.53%
Disagree: 8.60%
Strongly disagree: 4.30%

Q4 The events and exhibitions held on the REB&CG site are appropriate to the setting and the community.

Participants who answered this question: 184

Strongly agree: 30.98%

Agree: **41.85%**

Neutral: 14.67%

Disagree: 9.24%

Strongly disagree: 3.26%

Theme 3: A place that shares its stories

Most respondents agreed that the information available about the history, significance and features of the site is sufficient, however a large portion responded 'neutral' and there was a large portion who disagreed with the statement included in Question 5. Most respondents were aware that the site is included on the UNESCO World Heritage List.

For results about how people prefer to engage with information at the site, please refer to **Figure 3**.

Q5 The information available about the history, significance and features of the REB&CG site is sufficient.

Participants who answered this question: 183

Strongly agree: 14.75%

Agree: **34.43%**

Neutral: 26.23%

Disagree: 22.95%

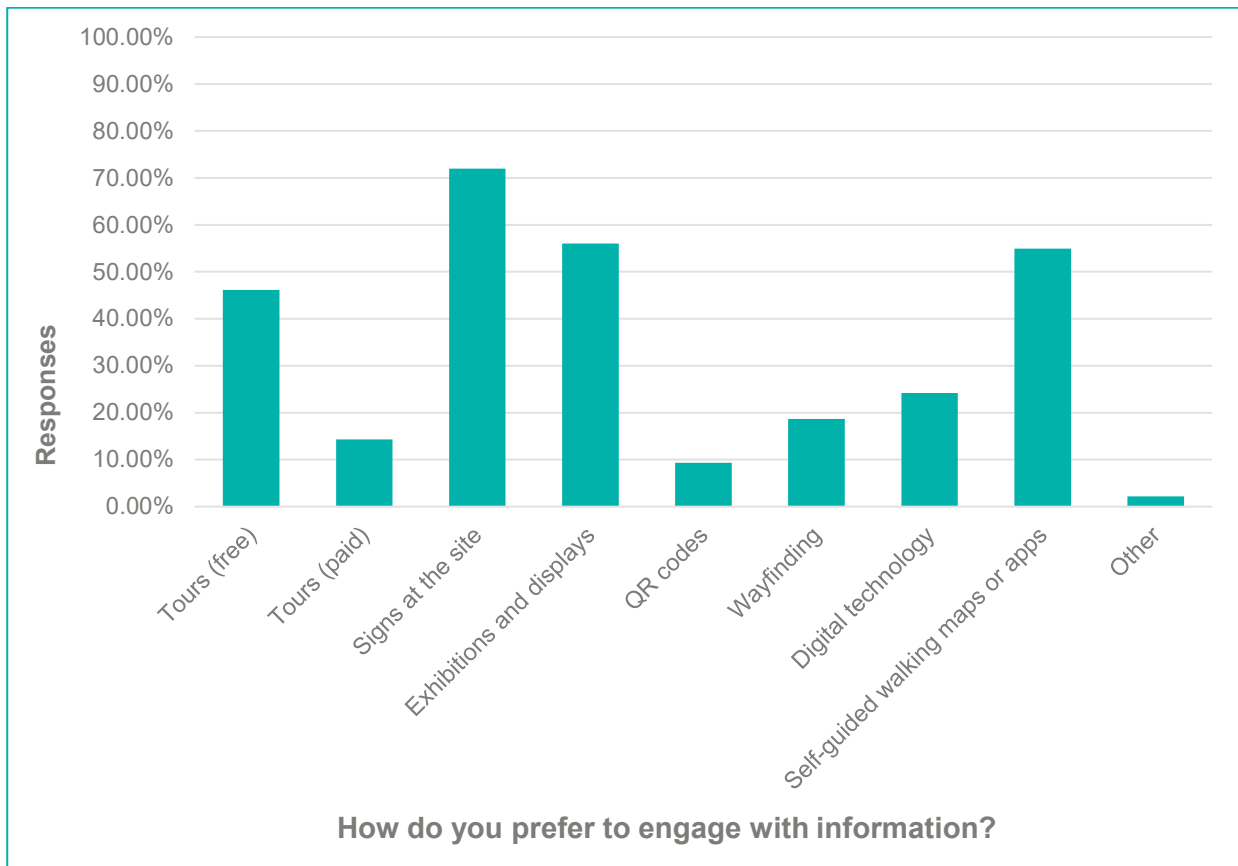
Strongly disagree: 1.64%

Q6 How do you prefer to engage with information about a heritage site when you visit? (participants could select more than one option)

Participants who answered this question: 182

Please refer to **Figure 3** for results.

Figure 3: Graph showing responses to Question 6. Most participants prefer to engage with information via signs at the site (71.98%), exhibitions and displays (56.04%), and free tours (46.15%).



Q7 Prior to completing this survey, were you aware that the REB&CG is included on the UNESCO World Heritage List?

Participants who answered this question: 185

Yes: **80.54%**

No: 19.46%

Other: 0%

Theme 4: A place with a secure future

Most participants chose the 'neutral' answer option when asked if there are adequate mechanisms in place to deal with threats to the World Heritage values of the site. A large number of participants agreed with the statements provided, however, there were some participants who disagreed or strongly disagreed.

Most participants agree that the Carlton Gardens need to adapt for changing climate conditions, whilst retaining their historic layout and features. Most participants also agree that the site needs to permit reasonable commercial use to sustain and promote its future.

Q8 There are adequate mechanisms in place to deal with threats to the World Heritage values of the site.

Participants who answered this question: 183

Strongly agree: 12.02%

Agree: 32.24%

Neutral: **36.61%**

Disagree: 12.57%

Strongly disagree: 6.56%

Q9 The gardens need to adapt for changing climate conditions, whilst retaining their historic layout and features.

Participants who answered this question: 187

Strongly agree: 32.09%

Agree: **45.45%**

Neutral: 11.23%

Disagree: 6.95%

Strongly disagree: 4.28%

Q10 The REB&CG site needs to permit reasonable commercial use within the site in order to sustain and promote its future.

Participants who answered this question: 185

Strongly agree: 17.30%

Agree: **36.76%**

Neutral: 22.70%

Disagree: 14.59%

Strongly disagree: 8.65%

Theme 5: A place protected in partnership

Most respondents agreed that they understand where to find information about the management of the site. There was, however, a large portion of respondents who answered 'neutral' to this statement or who disagreed.

For results about where participants expect to find information in relation to the management of the site, please refer to **Figure 4**.

Q11 I understand where I can find information about the management of the REB&CG site (such as the existing World Heritage Management Plan).

Participants who answered this question: 182

Strongly agree: 8.79%

Agree: **42.86%**

Neutral: 21.42%

Disagree: 23.08%

Strongly disagree: 3.85%

Q12 Where would you expect to find information about the management of the REB&CG site? (participants can select more than one option)

Participants who answered this question: 181

Please refer to **Figure 4** for results.

Figure 4: Graph showing responses to Question 12. Most participants expect to find information about the REB&CG on the City of Melbourne website (80.66%), the Heritage Victoria website (70.17%) and the Museums Victoria website (58.56%).



Theme 6: A place protected in its surrounds

Overall, the vast majority of participants agree that the WHEA is as important to protect and manage as the REB&CG site itself. The vast majority of participants also strongly agreed that new development in the WHEA must protect the prominence and sightlines to the REB&CG. When asked whether planning controls within the WHEA sufficiently protect the site, most respondents answered 'neutral'.

Free-text answers were sought in response to question 16, a representative sample of which is provided on **Page 16**.

Q13 The World Heritage Environs Area surrounding the REB&CG is as important to manage and protect as the site itself.

Participants who answered this question: 183

Strongly agree: **59.02%**
Agree: 32.79%
Neutral: 3.83%
Disagree: 2.73%
Strongly disagree: 1.64%

Q14 In order to maintain the historic character of the area, it's important that new development in the area protects the prominence and visibility of the REB&CG.

Participants who answered this question: 185

Strongly agree: **71.35%**
Agree: 21.08%
Neutral: 5.41%
Disagree: 1.62%
Strongly disagree: 0.54%

Q15 The planning controls within the WHEA sufficiently protect the World Heritage values of the REB&CG.

Participants who answered this question: 180

Strongly agree: 12.78%
Agree: 28.89%
Neutral: **38.33%**
Disagree: 13.89%
Strongly disagree: 6.11%

Q16 Do you live or work within the WHEA? If so, please share your experiences or thoughts about how the WHEA planning controls operate.

Participants who answered this question: 52

Below is a representative sample of responses received:

I live just outside the WHEA. I have been part of disappointing outcomes re. developments which have been given permits despite their detrimental effect on heritage.

I don't know much about them [the planning controls].

The controls are not apparent to the casual visitor. What is apparent is the growing wall of towers at the most important end of the gardens, which already compromises the historic site.

I live and work in the WHEA and also visit the gardens 5-6 times a week. The controls are too easy to circumnavigate by developers/others who wish to do so. The controls have loopholes and there is no single entity with strong enough control.

I live just outside the WHEA and think the controls are adequate but could be strengthened. This is a unique asset for Victoria and never worth jeopardising for marginal commercial gain, inside or surrounding the asset.

Three words: Corkman Irish Pub. About 1km as the crow flies from REB but it was destroyed with impunity. The streetscapes of Carlton and social venues like the Corkman are direct products of being in proximity to this major landmark.

I live with frontage onto Carlton Gardens. Honestly, it strikes me as deeply pointless and selfish to restrict development around the exhibition building, for the dual reasons that sightlines are more than protected at a reasonable distance, given its location.

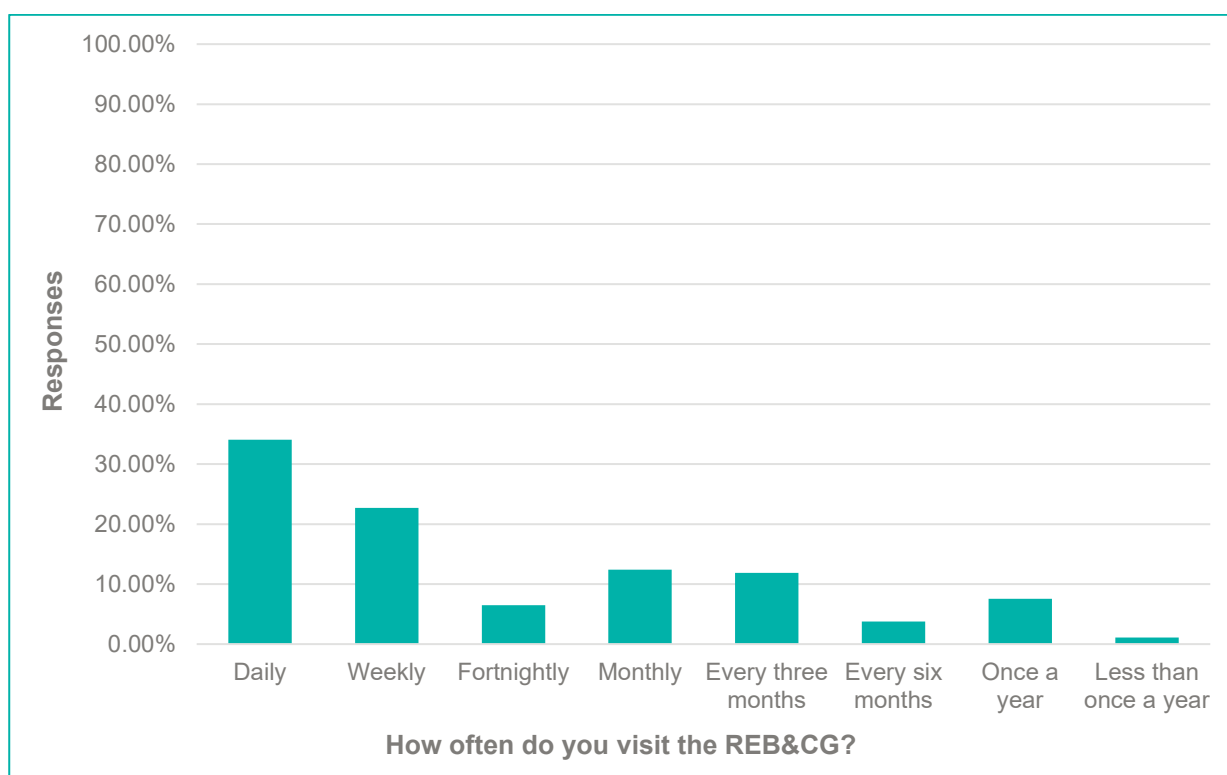
We asked a series of questions to find out how people use the Royal Exhibition Building and Carlton Gardens. This is what participants told us:

Q17 How often do you visit the REB&CG?

Participants who answered this question: 185

Please refer to **Figure 5** for results.

Figure 5: Graph showing responses to Q17. Most participants told us they visit daily (34.05%), weekly (22.70%) or monthly (12.43%).

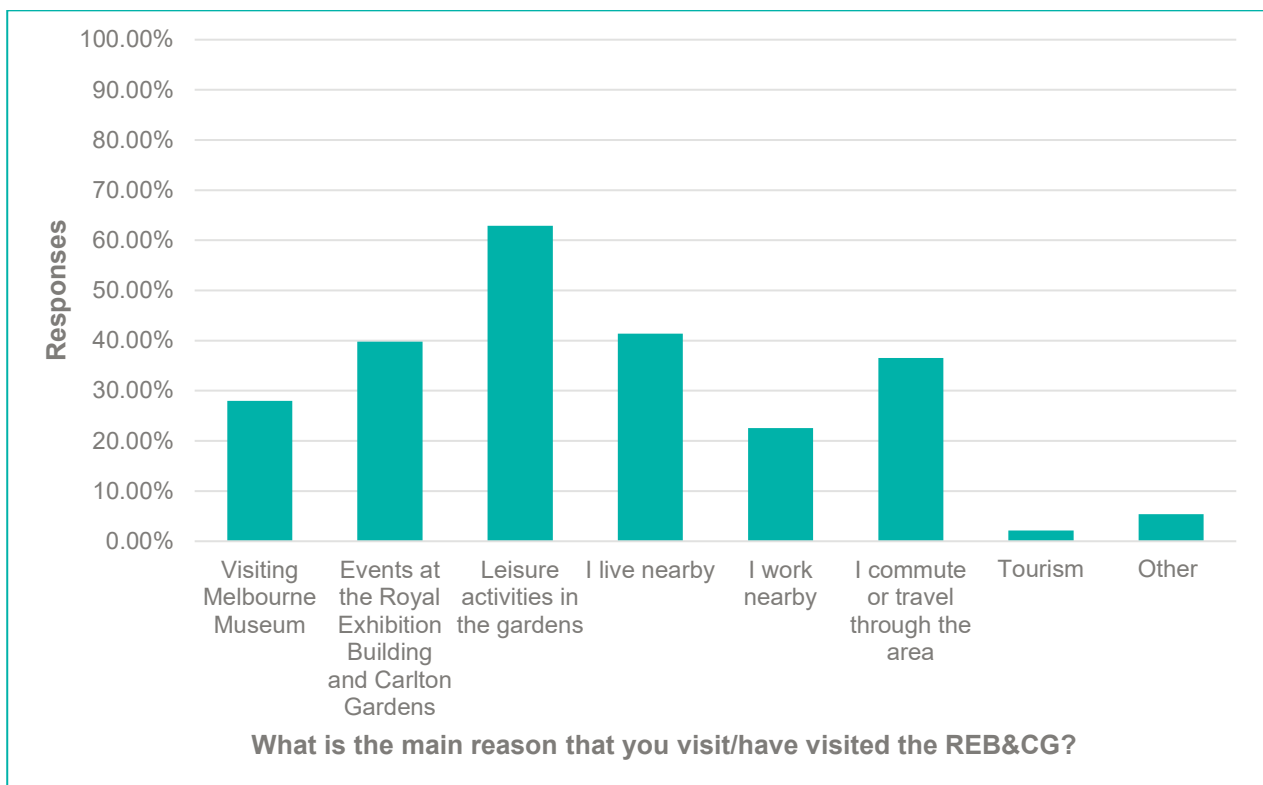


Q18 What is the main reason that you visit/have visited the Royal Exhibition Building and Carlton Gardens?

Participants who answered this question: 185

Please refer **Figure 6** for results.

Figure 6: Graph showing responses to Q18. Most participants told us they visit for leisure activities in the garden (62.90%), because they live nearby (41.40%) and for attending events at the REB&CG (39.78%)

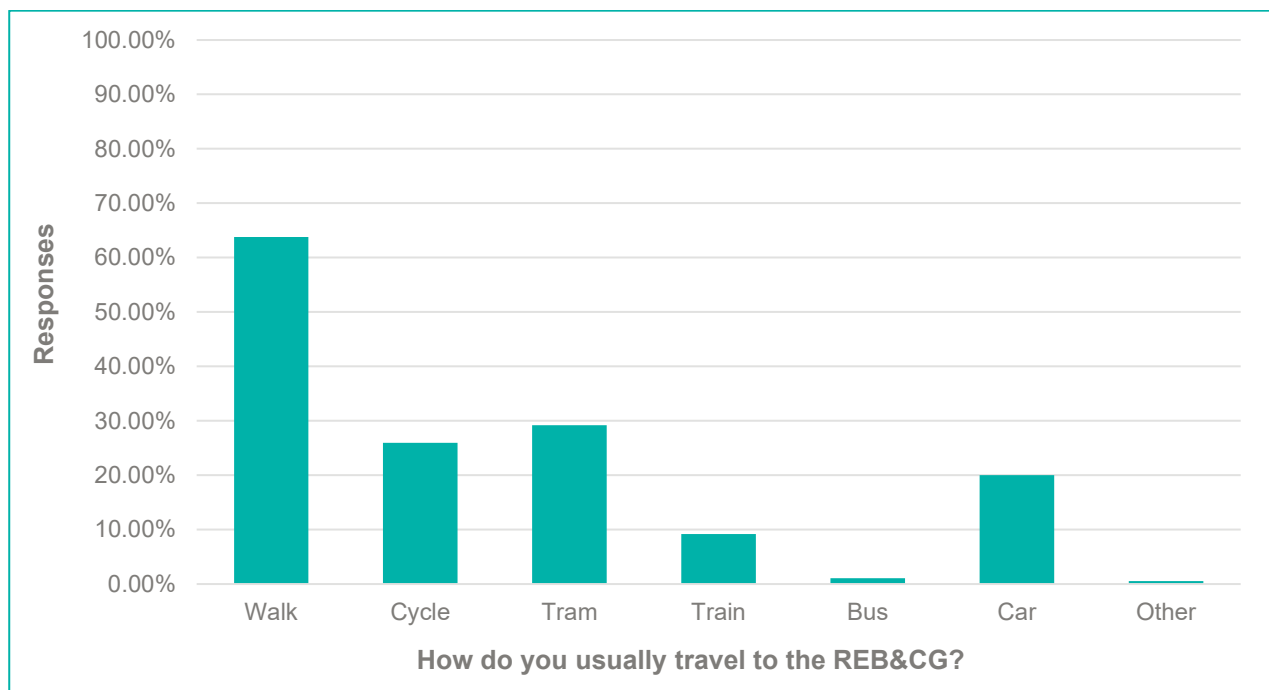


Q19 How do you usually travel to the Royal Exhibition Building and Carlton Gardens?

Participants who answered this question: 185

Please refer to **Figure 7** for results.

Figure 7: Graph showing responses to Q19. Most participants told us they travel to the REB&CG by walking (63.78%), catching the tram (29.19%) or cycling (25.95%).

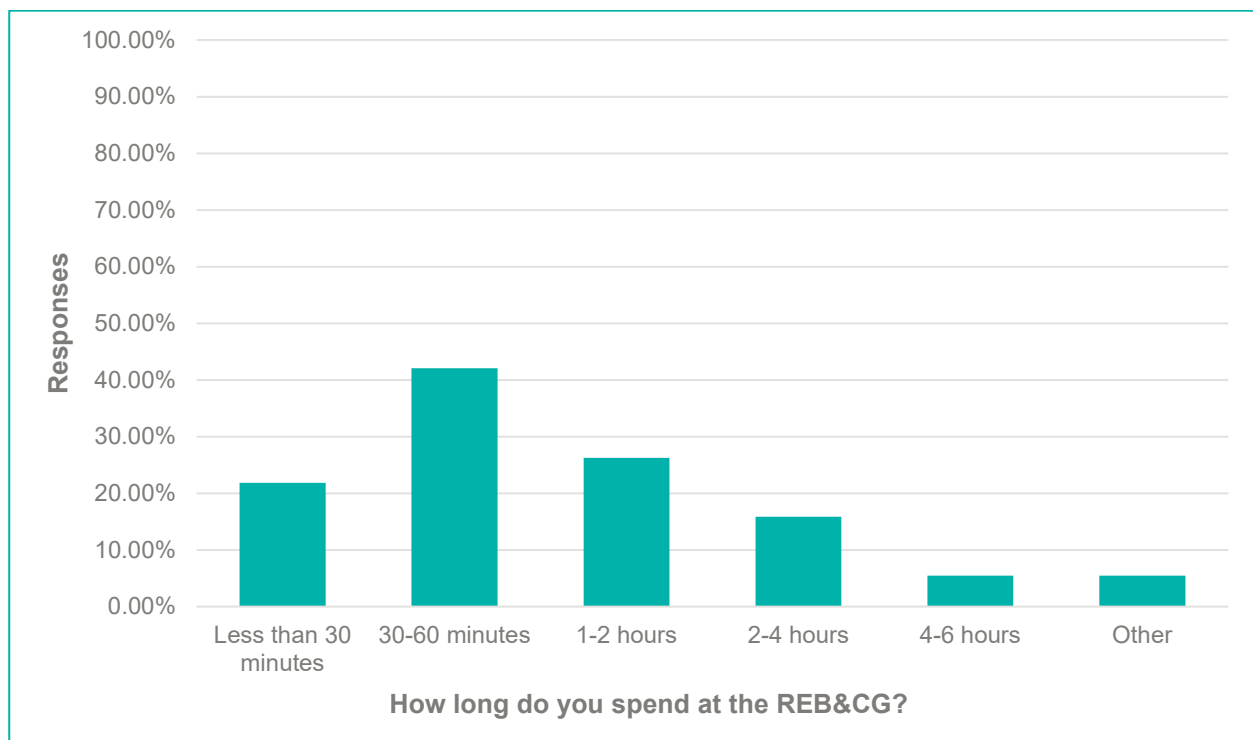


Q20 When you visit the REB&CG how long do you stay there?

Participants who answered this question: 183

Please refer to **Figure 8** for results.

Figure 8: Graph showing responses to Q20. Most participants told us they usually spend 30-60 minutes at the REB&CG (42.08%), 1-2 hours (26.23%) or less than 30 minutes (21.86%).



Q21 What is your favourite thing about the Royal Exhibition Building and Carlton Gardens?

Participants who answered this question: 145

Below is a representative sample of responses received:

I value the history embodied in the place and how that enriches lives in the present.

The flexibility and different ways the space is used by everyone.

Mature trees, fabulous grassed areas and well-maintained garden beds.

The vista down the central path towards the city, under the huge tree canopy.

I love the grounds - and I love that there is a feeling of community there, people bringing their children, having picnics, etc.

I love every part of the building and gardens, and frequently take visitors to Melbourne there.

I really like the Exhibition Buildings and Museum, but as a member of the tennis club it is Carlton Gardens Tennis Club that I love. I believe it fits in with the heritage feel of the gardens and is a well utilised facility.

EVERYTHING! I love the gardens, the museum, the fountain, the trees, the slope of the hills, seeing people sitting in the gardens.

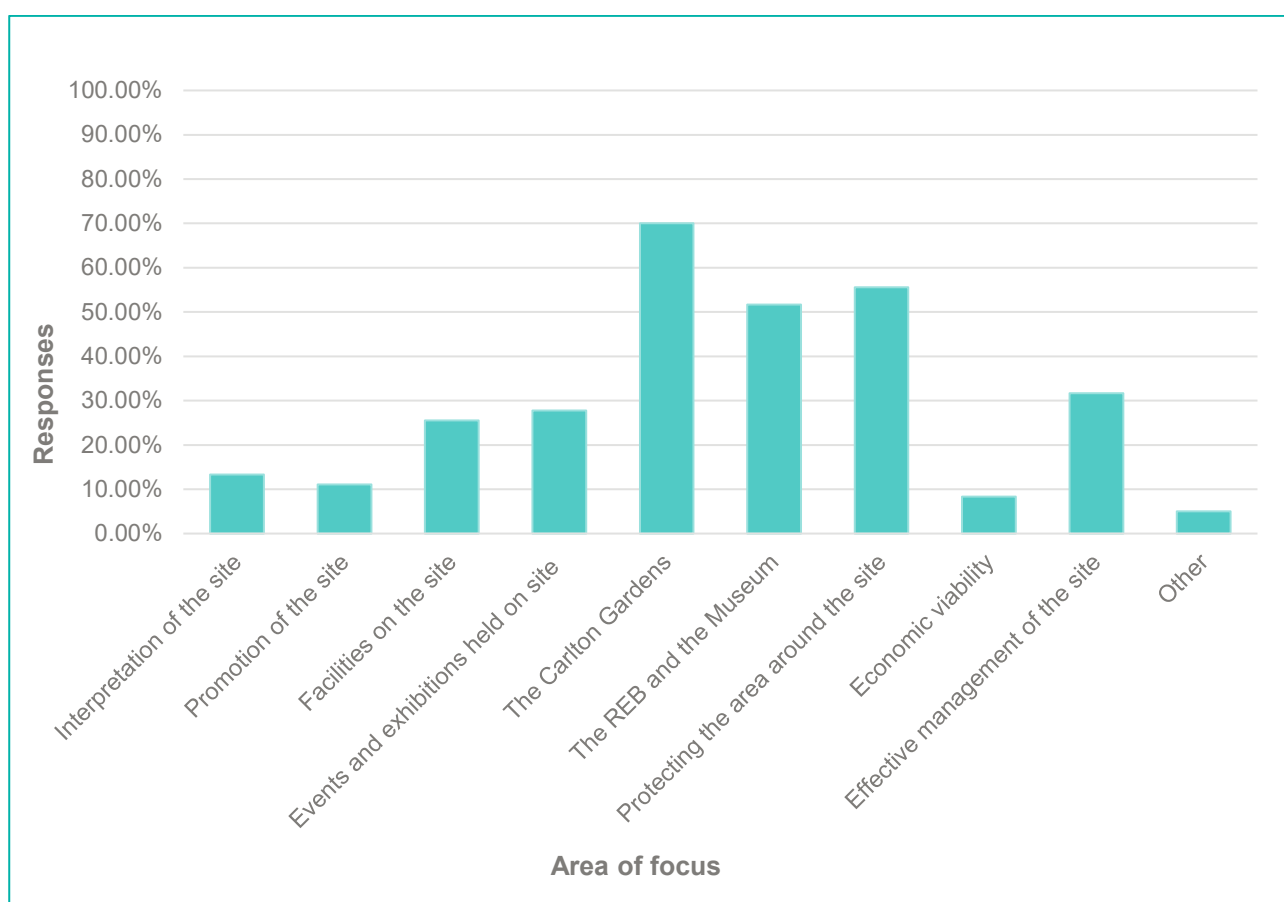
The tasteful juxtaposition between the historic building and the new museum architecture. I also love the big established gumtree on the Rathdowne Street side near the Imax entrance.

Q22 The World Heritage Management Plan ensures many aspects of the REB&CG site and protected and managed. Having read the discussion paper, and completed the survey, please identify your three most important areas of focus for the next seven years.

Participants who answered this question: 180

Please refer to **Figure 9** for results.

Figure 9: Graph showing responses to Q22. Most participants told us they think the most important area of focus at the site over the next 7 years is the Carlton Gardens (70.00%), protecting the area around the site (55.56%) and the REB and Museum (51.67%).



Q23 Anything else we need to know?

Participants who answered this question: 79

To conclude the survey we asked participants to provide any further information that may not have previously been captured. A free-text box was provided for participants and a range of responses were received. Overall, the majority of comments related to how the site is used and accessed and raised themes consistent with the information set out in **section 2.2** of this report. For this reason the information has not been repeated here.

2.3.2 Who took part in the consultation?

We asked participants to (optionally) provide their postcode. Of the 194 participants, 117 provided their postcode.

The vast majority of participants were from metropolitan Melbourne (93%), with 5% from regional Victoria and 2% from interstate (please refer to **Figure 10**). Of the participants from metropolitan Melbourne, 53% were from the suburbs directly surrounding the REB&CG (Carlton, Carlton North, Fitzroy and Melbourne).

Participation ranged across a total of 17 suburbs within metropolitan Melbourne. Although the majority of participants who provided their postcode were from the suburbs immediately surrounding the REB&CG, the geographic spread of survey participation was broad (please refer to **Figure 11**).

Figure 10: Chart showing percentage of participants from metropolitan Melbourne, regional Victoria and interstate.

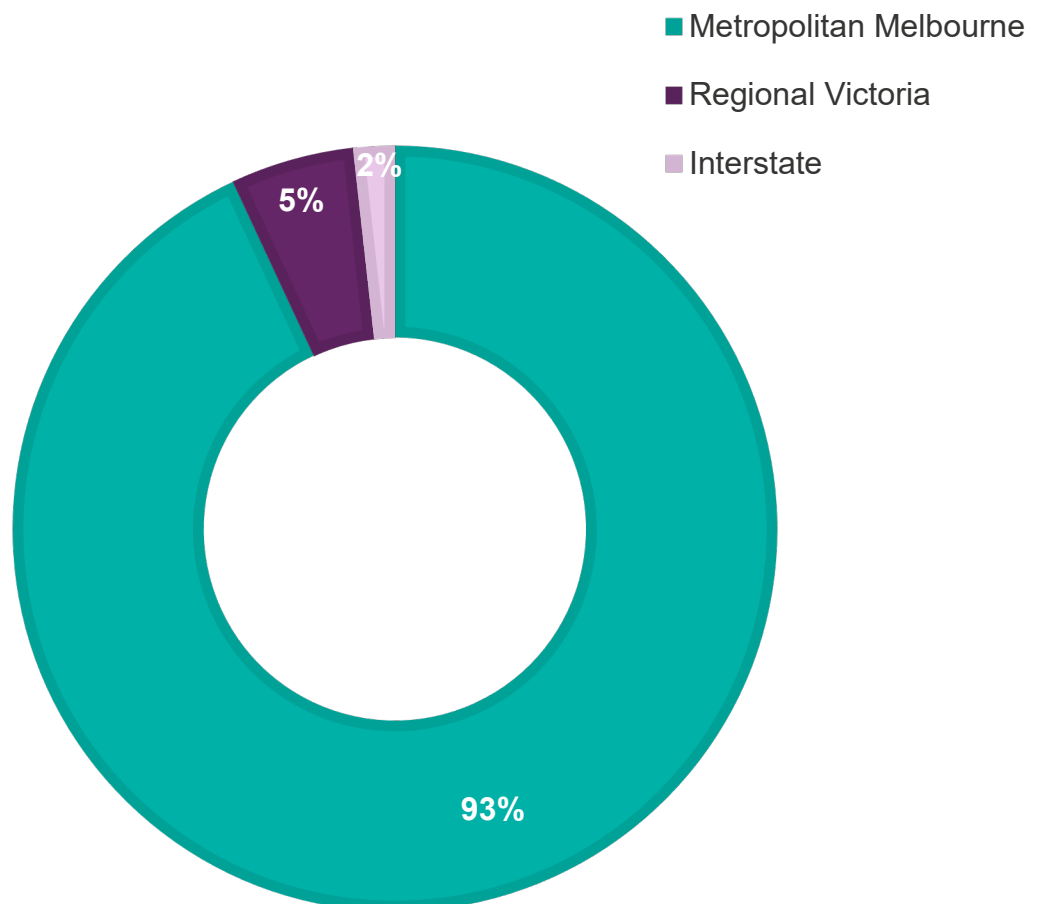
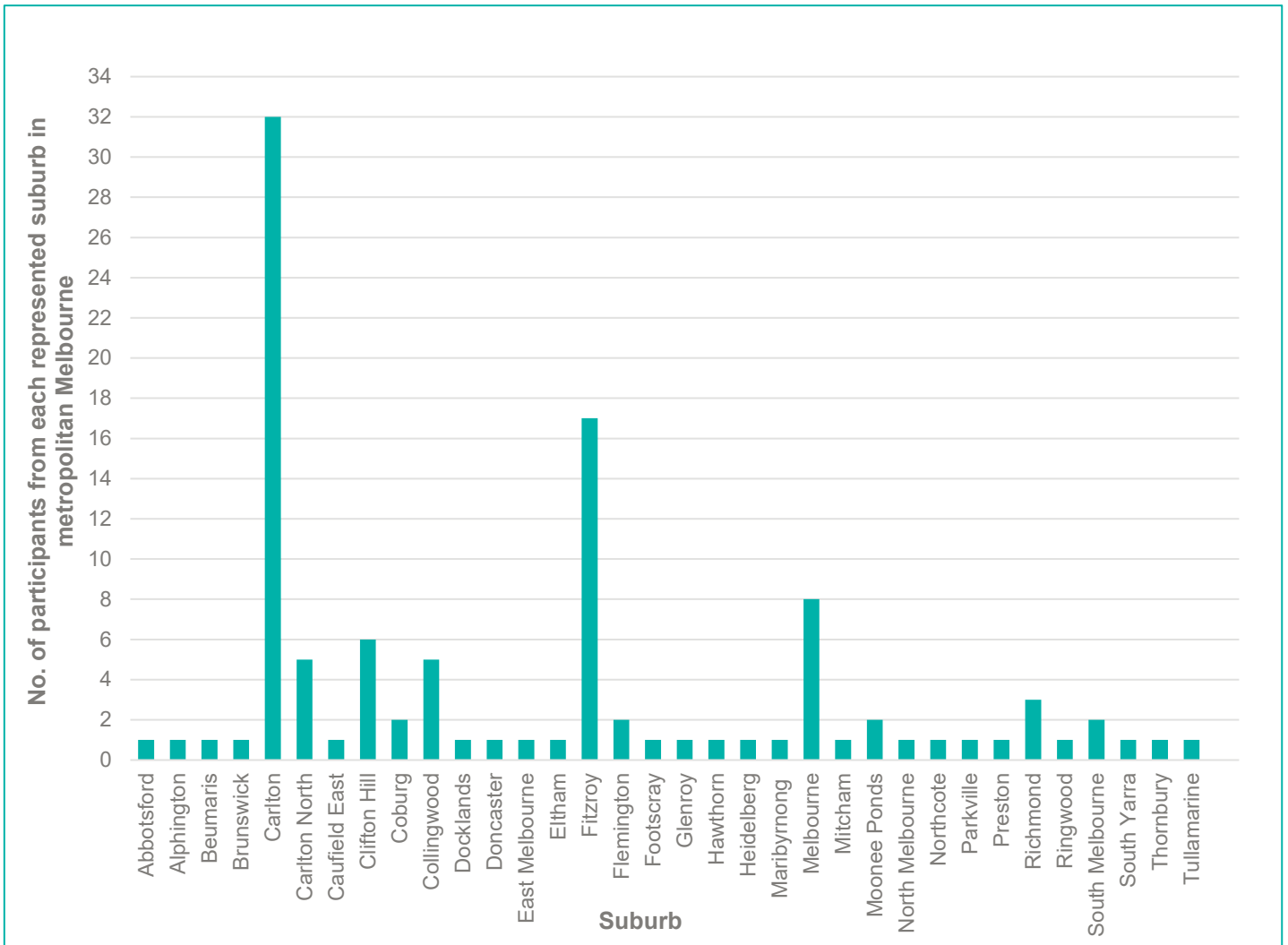


Figure 11: Graph showing the geographic spread of survey participation within metropolitan Melbourne and the number of participants from each of the represented suburbs.



2.3.3 Ideas for the future

Throughout the consultation period many people provided their ideas for the future of the REB&CG. These responses help us to know what people want from the site in the future and how community interaction and participation at the site might change.

A representative sample of responses is provided below:

Allow commercial activity within the site so that a café, bar or temporary food stall could be built.

Allow cyclists to ride (slowly and responsibly) through the gardens.

Consider an area for open air artwork or a seasonal sculpture walk.

Incorporate and collaborate with the Carlton Primary School by creating an easier and safer access route from the school to the site.

Basketball [court] needs sufficient lighting for use, especially during winter months.

Create a second entrance to the Museum on the side facing the Northern portion of Carlton Gardens.

Addition of an outdoor gym near the basketball courts, and a public toilet block near Nicholson Street.

Greater interpretation of Indigenous history of the site and acknowledgement of First Peoples.

Interpretation and identification of trees using signage or an app to communicate the history of the trees.

2.4 Written submissions

In addition to dropping a pin on the interactive map, or filling out the online survey, participants were able to lodge a written submission to the Steering Committee as part of the community consultation process. Written submissions were received either through the Engage Victoria website, or via email to the Heritage Victoria policy team.

In total, **fifteen (15) written submissions** were received.

2.4.1 Key issues raised

The following section is not intended to be a complete record of all issues raised in written submissions. Rather, it is a representative summary of the key issues that have been identified by the Steering Committee as being relevant to this review process.

From the written submissions received, five main issues emerged, being:

- the governance structure for the site;
- the content and structure of the existing *World Heritage Management Plan*;
- coordination of the current *World Heritage Management Plan* review process;
- management of the WHEA; and
- community consultation and involvement in the site's day-to-day management.

Whilst a number of written submissions also raised issues relating to the appropriate use of, and public access to, the site, these submissions substantially resemble the findings summarised in **sections 2.2.4** and **2.2.5** of this report. As such, this information has not been repeated in this section.

The Steering Committee notes that several written submissions responded to the draft review of the *Heritage Management Plan* (formerly the *Conservation Management Plan*), which was advertised for public comment over June and July 2020.

As stated in **section 1.2**, this report does not directly summarise submissions made in response to the draft *Heritage Management Plan* or those made as part of targeted consultation for the review of the *World Heritage Strategy Plan* for the WHEA. However, general comments made in relation to the management of the WHEA collated as a part of the community consultation have been included.

Governance structure for the site

Of the fifteen (15) written submissions received, ten (10) submissions made direct reference to the current governance structure of the site:

Key issues and suggestions raised include:

- UNESCO requirements are currently not being met in relation to governance, namely the establishment “a single institution to act as the nodal point for all World Heritage Matters and for communication with the World Heritage Centre” (quoted from United Nations policy *Managing Cultural World Heritage*);
- The current governance structure for the site is needlessly complex and fragmented for a small World Heritage site (i.e. different entities are responsible for managing different portions of the site, and it is not always evident as to whom manages what);

- The current governance structure for the site is vulnerable, and demonstrates an over-reliance on internal coordination and is prone to conflicts of interest between the represented agencies;
- The Steering Committee is not involved enough in the day-to-day management of the site;
- All members appointed to the Steering Committee should have voting rights;
- Several submissions suggested the establishment of an independent statutory authority to manage the site and the WHEA, to ensure transparency, independence and unified management;
- Several submissions suggested the establishment of a community advisory committee (or multiple advisory committees); and
- One submitter questioned the application of sections 181-183 of the *Heritage Act 2017* in relation to the functions and powers of the Steering Committee, and submitted that these functions and powers are broader than what is currently being practiced.

Content and structure of the existing World Heritage Management Plan

Of fifteen (15) submissions received, four (4) submissions made direct comment in relation to the document structure of the current *World Heritage Management Plan* for the REB&CG.

Key issues and suggestions raised include:

- The inclusion of a diagram/flow chart into the new *World Heritage Management Plan* is needed, to show inter-relationships between all attachment documents;
- Repetition of content across the *World Heritage Management Plan* and its attachment documents could be avoided by confining common themes (i.e. the history of the site) to the overarching *World Heritage Management Plan* document only;
- The overarching *World Heritage Management Plan* should describe in detail what the purpose and contents of each attachment document is;
- The current *World Heritage Management Plan* document structure is complex for such a small World Heritage site. Concern was expressed that the complexity of the document structure obscures its aim, being the protection and management of, and engagement with, the site and how this is achieved;
- It is difficult to find the information one needs across so many different documents, together amounting to hundreds of pages;
- Suggestion to consult with independent expert bodies, such as Australia ICOMOS, to “benchmark” the current *World Heritage Management Plan* document and its attachments with similar documentation prepared for other World Heritage sites in Australia and abroad, to identify areas for improvement; and
- Although the *World Heritage Management Plan* has the word “plan” in its title, the overarching *World Heritage Management Plan* document itself does not include any plan, and has no “substance”. It was suggested that the language used in the title of each document be reconsidered to more accurately reflect purpose and contents.

Coordination of the World Heritage Management Plan review process

Of the fifteen (15) submissions received, four (4) submissions made direct comment on the structure of the current *World Heritage Management Plan* review process.

Key issues and suggestions raised include:

- Further steps could be taken by the Steering Committee to ensure that the review process, and what it seeks to achieve, is well understood by the community;
- The Steering Committee should emphasise at future stages of public consultation that both the draft review of the *World Heritage Strategy Plan* for the WHEA and the draft review of the *World Heritage Management Plan* will be advertised for public comment, as required by the provisions of the *Heritage Act 2017*;
- The staggered release of attachment documents for review is confusing;
- Concern raised that the name of the current *Conservation Management Plan* will be changed to the *Heritage Management Plan* upon its review, even if this is to comply with the requirements of the *Environment Protection and Biodiversity Conservation Act 1999*. It was submitted that this title is confusingly similar to the overarching document for the site, being the *World Heritage Management Plan*;
- It was submitted that the current review process should be coordinated by an independent body. The same submission expressed concern that the governing body for the site is reviewing its own documents, and submitted that this renders the current review process flawed and opaque;
- One submitter expressed disappointment that information relating to the review of the *Heritage Management Plan* (formerly the *Conservation Management Plan*) has not been made publicly available (such as methodology, assessments, terms of reference etc.), and that the engagement of Lovell Chen – the consultancy engaged to prepare the previous *Conservation Management Plan* – to draft the reviewed *Heritage Management Plan* demonstrates a conflict of interest and a lack of transparency;
- One submitter expressed disappointment that the 2013 process for drafting and approving the current *World Heritage Management Plan* for the site was delayed, and that this delay allowed “unacceptable” development to occur within the WHEA; and
- One submitter expressed disappointment that submissions made in relation to the 2013 process for preparing and approving the *World Heritage Management Plan* were not published in full.

Management of the World Heritage Environs Area (WHEA)

Of fifteen (15) submissions received, six (6) submissions made direct reference to the management of the WHEA.

Key issues and suggestions raised include:

- The WHEA should be managed coherently with the rest of the site, and preferably by the same single authority;
- A site-wide interpretation management plan should be developed, which accounts for the management of the 19th century heritage setting of the WHEA;

- State-level planning controls should be applied to the WHEA, and a consistent set of Design and Development Overlay (DDO) controls be established as a matter of priority;
- A number of submissions supported the existing planning controls relating to the WHEA, and expressed concerns at the potential prospect of a tall building on the Royal Society of Victoria site located in the southern portion of the WHEA;
- One submitter put forward the view that the southern portion of the WHEA is already highly developed, and supported further development in this area;
- Submissions received in relation to the extent of the WHEA differed widely, with some submitters supporting an increase to the WHEA extent, and others requesting that the current extent be reduced; and
- Some submissions put forward the view that the *World Heritage Strategy Plan* for the WHEA should be accorded the status of an Incorporated Document in the relevant planning schemes, instead of a Reference Document.

Community involvement and consultation

Of fifteen (15) submissions received, four (4) submissions directly called for increased community engagement in the management of the site.

Key issues and suggestions raised include:

- The governing authority for the site should include representation from community groups, be it through the establishment of community advisory groups, or as full members of any revised governance model for the site following this review; and
- Improved, transparent consultation with the local Indigenous communities in relation to the management of the site is required.



3. Next steps

The valuable feedback provided by the community during the consultation period will be reviewed by the Steering Committee and responsible agencies and inform the review of the *World Heritage Management Plan* and attachment documents.

Responses provided during this period of consultation will make a strong contribution to the management of the Royal Exhibition Building and Carlton Gardens into the future.

3.1 Further opportunities to participate in the review process

Although this first stage of community consultation has now closed, throughout 2020 and 2021 there will be several other opportunities to participate in this review process, including:

- **Comment on the drafts of reviewed attachment documents**

Each of the attachment documents that make up the *World Heritage Management Plan* will be individually reviewed. The public will have the opportunity to comment on the reviewed draft of each document, noting that the *Heritage Management Plan* (Attachment A) was made publicly available between June and July 2020.

The remaining draft documents, including the *Carlton Gardens Master Plan* (Attachment B) and the *Royal Exhibition Building and Exhibition Reserve Master Plan* (Attachment C), will be made publicly available on the Engage Victoria website in 2021.

- **Make a submission on the *World Heritage Strategy Plan***

The *World Heritage Strategy Plan* (Attachment D) is currently being reviewed. In accordance with sections 171-175 of the *Heritage Act 2017* the draft *World Heritage Strategy Plan* must be made publicly available for comment once a draft has been completed. Any person may then make a submission relating to the draft document, and any person may request that a hearing be held before the Heritage Council of Victoria.

It is anticipated that the completed draft of the *World Heritage Strategy Plan* will be made available for public comment in late 2020 or early 2021.

- **Make a submission on the *World Heritage Management Plan***

The *World Heritage Management Plan* document is expected to be reviewed once the review process for each attachment document has been completed. In accordance with sections 184-186 of the *Heritage Act 2017* the *World Heritage Management Plan* must be made publicly available once a draft has been completed. Any person may then make a submission in relation to the draft document, and any person may request that a hearing be held before the Steering Committee.

It is anticipated that the completed draft of the *World Heritage Management Plan* will be made available for public comment in 2021-2022.

- **Stay informed**

To keep up to date and continue to participate in the review process, please visit and subscribe to the Engage Victoria website at <https://engage.vic.gov.au/rebcgreview>.

For further information on the review process please read the [Discussion Paper](#) and [Frequently Asked Questions](#) available from <https://engage.vic.gov.au/rebcgreview>.