



## **Submission to the Heritage Council of Victoria**

### **Draft *World Heritage Strategy Plan* for the Royal Exhibition Building and Carlton Gardens World Heritage Environs Area**

**FROM THE FRIENDS OF THE CARLTON GARDENS WORKING GROUP OF THE CARLTON RESIDENTS ASSOCIATION.**

#### **Response to Draft Strategy Plan for the Royal Exhibition Building.**

Generally we support these key recommendations for changes to the World Heritage Environs Area:

- The Plan aims to better protect the World Heritage values of the REB from inappropriate development in close proximity.
- The inclusion of important areas not currently included in the WHEA.
- The Drummond Street precinct - a significant proposal is for stronger development controls over an extended area, which includes the properties on the West side of Drummond Street. If adopted, this Plan would better protect the valued South East Carlton Heritage precinct from more inappropriate development.
- That the WHEA be extended to include properties on the West side of Drummond Street.
- Removing the distinction between Areas of Greater and Lesser Sensitivity and placing a Heritage control over the whole of the WHEA.
- The importance of views to and from the REB.

**We have, however, some serious concerns about how and when these changes can be achieved.**



## OUR MAIN CONCERNS

- **The Draft Strategy Plan**

The 2021 draft Strategy Plan has recommended against continuing the distinction between the Areas of Greater and Lesser Sensitivity - we agree with this proposal.

Currently part of the WHEA is included in two HO Precincts, H0992 in the City of Melbourne and H0361 in the City of Yarra planning schemes which both resulted from the 2009 Strategy Plan.

The boundaries of H0992 and H0361 followed the 2009 WHEA area of greater sensitivity. This 2021 draft Strategy Plan has recommended against the distinction between the Areas of Greater and Lesser Sensitivity. Hence it is a recommendation of this Strategy Plan that the boundaries of these HO areas be reconsidered in the future.

- The key question here is why these Heritage Overlay boundaries have not been extended to coincide with the recommended boundaries of the WHEA [when the distinction between the area of greater sensitivity and the WHEA has been scrapped].
- Retention of the existing boundaries of these Heritage Overlays creates further complications.

### **Heritage Overlay H0992**

In the case of H0992 in the City of Melbourne, the boundaries of this Overlay remain quite problematic. This arises because the currently gazetted Heritage Overlay map for this area is almost impossible to read;

And also because the area is defined by including those Individual Heritage Overlays within H0992 that are not on the Victorian Heritage Database.

### **Heritage Overlay area H0809, H0103 and H081**

A further complication arises because the two Individual Heritage Overlays at the southern end of Rathdowne Street [H0809 and H0103] have been incorrectly mapped.

To add to this “boundary confusion” it was never clear whether all [or just part of] H081 [the site of the former Children’s Hospital] should be included within H0992.



It should also be noted that the Heritage Overlay map, included at p47 of the Draft Strategy Plan, adds to this confusion over the boundaries of HO992. HO81 is omitted altogether, and the boundaries of HO809 and HO103 remain incorrect.

## **Statement of Significance for the WHEA.**

Another issue which arises is that the Draft Statement of Significance for the two HO Precincts [H0992 in the City of Melbourne and H0361 in the City of Yarra planning schemes] is nowhere to be found in the Draft Strategy Plan. In contrast, the 2009 version of the World Heritage Environs Area Strategy Plan included a detailed Statement of Significance for the two HO Precincts [pp 34 and following]. Although this citation addressed both Overlays in the one Statement; in other respects it followed accepted practice by separately addressing the key issues

What is Significant?

How is it Significant?

Why is it Significant?

According to the current Draft Strategy Plan [p 46] .....

In future the SoS for each of these HO areas should be updated to address their heritage values at the same time that their boundaries are reassessed. Keeping these values contributes to the retention of the setting of the REB & Carlton Gardens.

Given the expectation that all Heritage Overlays should be accompanied by a current Statement of Significance, it is not clear why this important update work has not been undertaken.

## **Draft Development Guidelines for the WHEA**

Draft Development Guidelines for the World Heritage Environs Area [Clause 22.21 of MPS]

The principal difference between this Draft Policy and the earlier Policy relates to the expanded area to which it applies. The existing Policy only provided guidance for the area of greater sensitivity whereas the proposed Policy is intended to provide guidance for the whole [expanded] World Heritage Environs Area.

However, given that the Government has not updated the boundaries of the existing Heritage Overlay 992 and that the Statement of Significance for this



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Heritage Overlay has not been updated, the community has been left with ongoing confusion over both the extent of HO992 and the status of the existing Statement of Significance for this Overlay [as outlined in the discussion above].

## **Views to and from the REB**

Views from the REB and particularly the REB dome promenade are important and should be referred to in the Statement of Significance for the revised WHEA including controlled building heights and retention of heritage properties.

Note: The Shangrila Hotel.

The unsafe and unsightly view of the former Cancer Council building.  
Proposed developments in Gertrude Street and St Nicholas' Hospital

## SUMMARY OF OUR CONCERNS:

- Why have the Heritage Overlay Boundaries not been extended to coincide with the recommended boundaries of the WHEA?
- HO992 Boundary is defined by including those Individual Heritage Overlays within the HO992 that are not in the Victorian Heritage Database.
- Boundaries need to be reconsidered to alleviate present confusion.
- Protection of Views to and from the REB.
- Boundary confusion regarding the site of the former Royal Children's hospital.
- Working together with the other council areas -- it is in our mutual interest to work together.

**Thank You for the opportunity to respond to this draft Strategy Plan.**

Patricia O'Loughlin in conjunction with Peter Sanders & Ewan Oglivy  
On Behalf of the CRA – Friends of the Carlton Gardens Working Group