

Royal Exhibition Building & Carlton Gardens World Heritage Management Plan



Attachment E Report on the Public Submissions to the Draft World Heritage Management Plan

ROYAL EXHIBITION BUILDING (REB) AND CARLTON GARDENS WORLD HERITAGE MANAGEMENT PLAN STEERING COMMITTEE

REPORT ON THE PUBLIC SUBMISSIONS TO THE DRAFT WORLD HERITAGE MANAGEMENT PLAN, 6 MARCH 2012

1 INTRODUCTION

1.1 The Registered Place

The Registered Place¹ is the Royal Exhibition Building (REB) and Carlton Gardens (the Place). The Place is located on Land Reserve Rs 37130 (Royal Exhibition Building and Museum of Victoria) and Rs 9990 (Carlton Gardens), Crown Allotments 1, 2 & 3, Section 19A, Parish of Jika Jika, at Carlton. The Place is bounded by Rathdowne Street to the west, Carlton Street to the north, Nicholson Street to the east and Victoria Street to the south.

The Place is included on the World Heritage List, the National Heritage List, the Victorian Heritage Register (H1501) and has cultural heritage significance at a local level. Part of the Place is also a registered Aboriginal heritage site (H7822-2035).

The inclusion of the Place on the UNESCO World Heritage Register imposes a series of obligations upon the Commonwealth and State Governments. The Commonwealth Government's obligations are set down in the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The State Government's obligations are set down in the *Heritage Act 1995* (Victoria) (Act). S62M of the Act provides that the Minister must appoint a Steering Committee (the Committee).

One of the responsibilities of the Committee is to 'prepare a World Heritage Management Plan'. Sections 62O-62R of the Act set out the process to be followed by the Committee in preparing the Plan. S62O outlines the required content of the Plan, s62P provides for the notification of parties about the draft Management Plan. S62Q allows any person to make a submission in relation to the draft Management Plan, while s62R (b) provides the Committee with the power to conduct a hearing in relation to the draft Management Plan. S62T provides the Minister with the capacity to either approve the Management Plan as adopted by the Committee, or amend and then approve the amended Plan. Once approved, the Minister is required to transmit the Management Plan to the [Hon Tony Burke MP] Federal Minister for Sustainability, Environment, Water, Population and Communities, requesting that it be provided to the UNESCO World Heritage Centre in Paris.

The current members of the Committee are Mr Jim Gard'ner, Dr Patrick Greene and Ms Angela Hill. The Chair, Mr Gard'ner was appointed to the Committee by letter dated 18 December 2009. Dr Greene and Ms Hill were both appointed to the Committee by letter dated 10 June 2009.

In accordance with the provisions of the Act, the Committee prepared a draft Management Plan. It was duly advertised and submissions were sought. A summary of the public notification process undertaken and the submissions made follows.

¹ This report uses the term 'Registered Place' to refer to the Royal Exhibition Building and Carlton Gardens World Heritage site including its world, national, state and local heritage values.

1.2 Public Notification

The notice of the draft World Heritage Management Plan was published in the *Herald Sun* and *The Age* newspapers on 9 June 2011 and the *Melbourne Leader* and the *Melbourne Weekly* in the week starting 6 June 2011. Leaflets were distributed to all properties and property owners within the World Heritage Environs Area (Buffer Zone) on or about the 27 May 2011 by the City of Yarra and the City of Melbourne.

Individual invitations to make a submission were sent from the Chair of the Steering Committee to the following individuals and organisations. Dr Kathy Alexander, CEO, City of Melbourne; Mr Adam Bandt MP; Mr Greg Barber MLC; Mr Jim Berg, Chair, Victorian Aboriginal Heritage Council; Dr Graeme Blackman OAM, Chairman National Trust of Australia (Victoria); Cr Alison Clarke, Mayor, City of Yarra; Mr Richard Davey, Property Manager, Crown Land, Department of Sustainability and Environment; Dr Andi Diamond, CEO, City of Yarra; The Right Hon the Lord Mayor Robert Doyle; Dr Jane Harrington, President, Australia ICOMOS; Professor Margaret Gardner AO, President, Museums Board of Victoria; Mr Daryl Jackson AO, Chair, Heritage Council of Victoria; Professor Carmen Lawrence, Chair, Australian Heritage Council; Ms Bronwyn Pike MLA; Dr Greg Terrill, A/First Assistant Secretary, Heritage Division, Department of Sustainability, Environment, Water, Population & Communities.

A public information briefing was held at Museum Victoria on 8 June 2011.

1.3 Submissions Received

Written submissions to the draft Management Plan were received from

- Mr Con Angelatos
- Australia ICOMOS
- Mr Adam Bandt MP
- Ms Margaret Birtley
- Ms Margaret O'Brien
- Ms Leanne Burrows, Assistant Director, Heritage and Wildlife Division, Department of Sustainability, Environment, Water, Population and Communities (DSEWPC)
- Carlton Residents' Association (CRA)
- The City of Melbourne
- Coalition of Residents and Business Associations (CoRBA)
- Mr Kevin Davis and Ms Renee Brown-Bryant
- Ms Elizabeth Decker and Ms Sarah Kurtz
- Ms Sarah Edwards and Ms Callie Crabb
- Fitzroy Residents' Association (FRA)
- Friends of the Elms (FoTE)
- Mr John B Griffiths
- Ms Natasha Guantai
- Mr Tom Keel
- Mr Billy McCarley and Mr Jason Brooks
- The National Trust of Australia (Victoria)
- Mr Peter Navaretti
- Ms Crystal Perez and Ms Nancy Murray
- The Protectors of Public Lands (Victoria) (PPL)
- Ms Margaret Pullen
- Residents 3000

Submissions to the Committee have not been made public at this stage. However, in the interests of transparency, it is the Committee's view that submissions made to the Committee be released on-line, providing that consent can be obtained from their authors. A copy of this report should also be released.

1.4 The Hearing

In addition to seeking written submissions, the Steering Committee also determined that it would conduct a hearing into the matter pursuant to s62R(b) of the Act. The hearing was held on Wednesday, 7 September 2011 at the Royal Australasian College of Surgeons. Oral submissions were received from the following parties:

- Mr Con Angelatos
- Professor Rob Adams (City of Melbourne)
- Mr Brian Falconer (Carlton Residents' Association)
- Cr Jackie Fristacky (in a private capacity)
- Ms Natasha Guantai
- Ms Jo Grigg (Friends of the Elms)
- Mr Tom Keel
- Mr Tom Keel and Mr Brendan Lynch (Fitzroy Residents Association)
- Mr Tom Pikusa, Mr Rob Galbraith and Ms Julianne Bell (PPL)

At the hearing additional material from the City of Melbourne and Mr Angelatos was tabled. The Committee accepted the material and it has been considered in the preparation of this report.

Following the hearing three additional submissions were received. The first, received on 9 September 2011, was from the City of Yarra, the second (a supplementary submission from Ms Natasha Guantai) was received on 12 September 2011; and the third, received on 25 October 2011, was from DSEWPC. The Committee has determined that all these submissions are relevant and each has been considered in the preparation of this report.

2 SUMMARY OF SUBMISSIONS

This section is not intended to be a complete record of submissions that were made to the Steering Committee, or of all the issues raised. Rather, it is a summary of what the Committee considered to be the key issues, followed by an explanation of the position the Committee takes on each issue.

Rather than summarising each submission, the Steering Committee has decided to adopt a thematic approach, identifying the key themes and noting the position adopted by various parties.

2.1 Management and Presentation of the Carlton Gardens

The impact of the Melbourne International Flower and Garden Show (MIFGS) was identified by several submitters as a significant management issue. These submitters argued that holding the event in the Carlton Gardens undermined the integrity and jeopardised the heritage value of the Place. For example, the City of Yarra's submission noted what it perceives as a tension between section 8.1 of the Management Plan, which provides that: 'actions that have unacceptable or unsustainable impacts on heritage values – in particular on World and National Heritage values – are inconsistent with this Management Plan and cannot be approved' and the annual MIFGS event.

More particular comments were made in the submission of Ms Margaret O'Brien which consisted of a document titled 'notes for meeting with Matthew Guy, Minister for Planning'. Ms O'Brien noted that the Gardens were slow to recover from the impact of MIFGS 'over the years of drought to 2010 recovery [was] slow and poor, much turf died and other areas didn't recover. Also over years [there was] considerable tree loss and additional heavy limb loss and [the] obvious deterioration in health of old heritage trees.'²

Ms O'Brien's claims were reiterated in the submission of PPL which argued:

*The impacts of the MIFGS (which includes the installation of heavy landscape exhibits, truck traffic and foot traffic of 120,000 visitors plus the work of excavators digging up and re-laying damaged turf) include direct damage to the limbs and trunks of trees in the southern gardens and the impact of soil compaction on and damage to the root systems of trees.*³

PPL suggested that at the very least:

*The holding of the MIFGS should be reviewed in light of the adoption of the management plan to ensure that the practices and procedures adopted by the MIFGS and the Melbourne City Council are consistent with the management plan.*⁴

Images taken by Ms O'Brien and presented to the Steering Committee by the FRA showed damage to the Carlton Gardens following the holding of the MIFGS.

Other Submitters also objected to MIFGS, but focused upon the way in which the event prevented public access to a large part of the Place for a portion of each year. Ms Natasha Guantai, the CRA and Mr Con Angelatos each expressed concerns of this nature.

Ms Guantai's first submission noted that 'unlike many other exhibition venues, the REB and CG are to be enjoyed in themselves, independently of the events being held, and therefore need to be protected and available to the public.'⁵ In a similar vein, the CRA submitted 'the use of public open space (the Gardens) for commercial purposes such as exercise classes and events such as the annual Melbourne International Flower and Garden Show should not be permitted'.⁶

² Margaret O'Brien, 9 June 2011.

³ PPL (Vic) 9 August 2011.

⁴ PPL (Vic) 9 August 2011.

⁵ Natasha Guantai, 9 August 2011.

⁶ CRA, 8 August 2011.

At the hearing, a number of submitters also discussed the impact of MIFGS. Oral submissions by the PPL made specific reference to the impact of machinery used to restore the Carlton Gardens after the MIFGS. In submissions to the Steering Committee, Mr Rob Galbraith noted how machinery (including bobcats) compacted the soil and the way in which this decreased water penetration and oxygen flow to the tree roots, leading to an increase in toxins in the soil and reducing the lifespan of the trees.

The City of Melbourne's submission also raised issues about the impact of demographic changes within the City of Melbourne and the impact of climate change upon the management of the Carlton Gardens.

In respect of demographic changes to the City, the submission lodged by the City of Melbourne noted that between 2011 and 2026 it is anticipated that the residential population of Carlton will increase by 62% and the residential population of the CBD will increase by 67%. As a result, it was argued that 'it is anticipated that the level of use in all existing open spaces will increase'.⁷

In respect of climate change, in oral submissions Professor Rob Adams stressed the need for the management of the Carlton Gardens to take into consideration the impact of a hotter and drier climate. In particular, Professor Adams noted that elms had survived better than many other varieties of trees on 'Black Saturday' (7 February 2009), and that in the future it may be necessary for a Management Plan to consider the types of trees that are most drought resistant and allow for the regular watering of significant trees within the Carlton Gardens.

On a more general note, submitters contrasted the historic appearance of the Place with its appearance today. Particular reference was made to the loss of historic architectural features, for example gates, fences and flagpoles.⁸

2.2 Management and Presentation of the Royal Exhibition Building and Exhibition Reserve

The management and presentation of the Royal Exhibition Building and Exhibition Reserve was also a point of contention. The issue of car-parking, the possibility of re-establishing the 'Dome Walk' and the choice of tree varieties were amongst the topics raised by submitters.

In relation to the existing car-parking arrangements, the National Trust commented that the Royal Exhibition Building and Exhibition Reserve Master Plan appears to give priority to car-parking over plans to 'restore the south drive and the eastern forecourt' which, in the opinion of the Trust is strange as 'there is already a large car-park under the plaza to the north'. The Trust's submission concluded that:

It is especially important that the current daily uses of these areas for car-parking should be dealt with, as this seriously detracts from the current visitor experience of what should be an exemplary restoration of the immediate setting of this important building.⁹

⁷ City of Melbourne, August 2011.

⁸ See, for example, FRA, 7 August 2011.

⁹ National Trust of Australia (Victoria), 9 August 2011.

Ms Guantai's first submission also expressed concern about the impact of car-parking upon the appearance of the Exhibition Building and Reserve. She noted that there had been a reduction in the extent of car-parking available, but urged that:

... this good work should not be considered complete. The buildings, gardens and fountains are popular photographic subjects and yet the cars, driveways and traffic markings immediately surrounding the buildings continue to intrude even favoured viewpoints.

Ms Guantai maintained that, as a result:

All unnecessary vehicles and traffic accompaniments (signs, parking bays, roads etc.) should be removed or hidden to ensure that the REB and CG are to be given their respect as historical and cultural icons.¹⁰

The re-opening of the Dome Walk was raised in the submissions of both Mr Keel and the CRA. Mr Keel's submission dealt with the proposed re-opening in some detail. He argued that the walk would be 'a glorious addition to Melbourne, for both residents and tourists alike'. Mr Keel went on to draw attention to the financial benefits of re-opening the walk: 'On our own calculations, I estimate that a dome walk could... be self funding.'¹¹

The submission of Mr Angelatos focused upon the replacement of several trees within the south Carlton Gardens. In both written and oral submissions to the Steering Committee, Mr Angelatos asserted that the young English Oak (*Quercus robur*) trees that had recently been planted were 'late defoliant' in their character. Mr Angelatos asserted that as a result:

These oak trees will not act like the previous large oak ... trees. They will not lose their leaves during winter. The leaves will turn brown and stay in place persistently through the winter and not release until the new spring leaf forces them off.¹²

Issues relating to the management of new trees were also addressed in the submission of the National Trust which questioned the planting patterns adopted and also raised concerns about trees obscuring views of the main building:

In relation to the often stated desire to link the landscaping of the north and south gardens, we note that historically they were not particularly well linked, since there were annexes on each side that left only small spaces between them and the bounding streets. This is not to say that the gardens should be now totally separated by hard landscaping, but that planting multiple trees as proposed would not be a restoration, and may in fact obscure views of the main building that have always been open.¹³

Other management issues were also identified by submitters. Mr John Griffiths, for example noted the badly cracked granolithic paving laid between the Museum and the Royal Exhibition Building,¹⁴ while Ms Margaret Pullen commented upon the 'non heritage purple sign' that hangs on the Royal Exhibition Building facing Rathdowne Street.¹⁵

¹⁰ Natasha Guantai, 9 August 2011.

¹¹ Tom Keel, 3 August 2011.

¹² Con Angelatos, 8 August 2011.

¹³ National Trust of Australia (Victoria), 9 August 2011.

¹⁴ John Griffiths, 8 August 2011.

¹⁵ Margaret Pullen, 7 August 2011.

2.3 Interpretation

There was general concern amongst the submitters that not enough had been done to promote and interpret the Place. The submission lodged on behalf of the FoTE made the point succinctly ‘the general public and visitors to Victoria need to be more informed as to the value of this WH site, through public information sessions and education facilities’.¹⁶

Other submitters also expressed concern that not enough was being done to inform the public about the importance of the Place. The submission lodged by Mr Adam Bandt MP made particular reference to the importance of recognising the role of the Royal Exhibition Building as the site of the first Federal Parliament.

*While the REB&CG was inscribed on the UNESCO World Heritage List as “the extant survivors of a Palace of Industry in its Setting”, the National Heritage List citation and Victoria Heritage Register citation rightly emphasise the role of the site in the commencement of Australia’s Federal Parliament. This role should be emphasised in the ... Royal Exhibition and Carlton Gardens Conservation Management Plan and Royal Exhibition and Exhibition Reserve Master Plan.*¹⁷

Mr Bandt went further, suggesting that: ‘an annual commemoration of the birth of the Australian Parliament’ could also assist in stressing the role of the Place in Australia’s and Victoria’s history.¹⁸

Ideas about the way in which the Place could be better interpreted were also discussed at the hearing. Mr Tom Keel suggested that an iPhone application could be one way in which to provide relevant information to the general community, Ms Julianne Bell argued that the City Circle Tram tour (which passes the site) should also provide additional information about its history and status as Victoria’s only World Heritage site. While Mr Navaretti argued that more could be done with the existing interpretative signage:

*The Interpretation Signage, should not only explain the visible aspects of the building and the gardens, but also should be able to tell the history of the various uses of the building and site, particularly the invisible aspects of the former structure and their various uses by the State Government and the people of Melbourne.*¹⁹

¹⁶ FoTE, 23 August 2011.

¹⁷ Adam Bandt MP, 8 August 2011.

¹⁸ Adam Bandt MP, 8 August 2011.

¹⁹ Peter Navaretti, 17 August 2011.

2.4 The World Heritage Emblem

In a submission lodged on behalf of DSEWPC, Ms Leanne Burrows provided a copy of the *World Heritage Emblem Guidelines for use in Australia*. The guidelines aim to ensure the consistent use of the various versions of the World Heritage emblem and require that parties planning to use the emblem seek permission from DSEWPC who, in turn; will consult with the World Heritage Centre.²⁰

2.5 Composition of the World Heritage Steering Committee

Submissions relating to the composition of the Steering Committee were received from several parties. The FRA noted that the composition of the Steering Committee did not properly reflect the interested parties. In particular, the FRA submission was critical of there being no representative from the City of Yarra, despite the WHEASP (World Heritage Environs Area Strategic Plan) being one of the documents in the World Heritage Management Plan.²¹ In addition, the FRA also suggested that a representative from the DSEWPC be added to the Steering Committee.

The FRA also raised concerns about the Committee serving as both the body that prepares the draft plan and the body that considers proposed amendments to the plan and suggested that the Heritage Council (as an independent statutory body) would be better placed to consider any amendments to the plan developed by the Steering Committee.²²

2.6 Community Engagement

In his submission Mr Adam Bandt MP expressed concerned that no Indigenous parties were consulted during the preparation of the Management Plan and that there were limited mechanism in the Management Plan for ensuring ongoing community involvement.²³ Yarra City Council was also of the view that it was important for other parties to be involved in the ongoing management of the Place. 'Yarra City Council suggests that an Advisory Committee be established comprising those stakeholders referred to in Section 9.4 of the Plan and including Yarra City Council'.²⁴ FoTE were of a similar view, and recommended 'slightly increasing the number of organizations represented on the Steering Committee, which would include the City of Yarra and the National Trust'.²⁵

²⁰ DSEWPC, World Heritage Emblem Guidelines for Australia, Undated.

²¹ FRA, 7 August 2011..

²² FRA, 7 August 2011.

²³ Adam Bandt MP, 8 August 2011.

²⁴ City of Yarra, 19 August 2011.

²⁵ FoTE, 9 August 2011.

2.7 World Heritage Management Plan – Consultation and Preparation

There were a number of comments made that specifically addressed perceived shortcomings in both the process through which feedback had been sought in relation to the draft Management Plan and the contents of the Plan. In relation to the feedback process, CoRBA- Melbourne argued that the Draft WHMP:

Did not reach many community groups and stakeholders. It is understood that there were media advertisements, letterbox drops and some mail-outs, with information on three websites but somehow the information did not have a wide reach. The Parks and Gardens Advisory Committee reported that it has not been contacted. Several stakeholders have felt disadvantaged by information being communicated very late. Some community groups contacted each other via word of mouth.²⁶

In CoRBA's view communication could be improved by:

- a) Dedicated ads in the media that are eye-catching.
- b) Public contacts through local community groups, their websites, residents, business, traders.
- c) 'Whole of Melbourne' advertising through newsletters, magazines and other publications.

As a result of what was perceived as a failure to properly engage the public, the CRA argued that:

The draft WHMP has been produced without enrichment through public participation in public forums, round tables or community events. The local communities in particular want to share their time, expertise, ideas, enthusiasm and most of all their passion for their WH site. They (and the public at large) have been denied a "warm feeling of ownership" and many have expressed a lack of confidence in the process. The consequences of this are compounded by the Steering Committee sitting in judgement on submissions seeking changes to its own work.²⁷

Other submissions expressed concern about the complexity of the number of organisations credited with preparing the Management Plan, or the relationship between various elements of the plan. In relation to the first point, the National Trust noted that:

It is somewhat confusing as to who is the author of the Royal Exhibition Building and Carlton Gardens World Heritage Management Plan June 2011. DPCD, Heritage Victoria, City of Melbourne and Museum Victoria all have their logos on the front cover, but not all are charged with responsibility for managing the place. The Heritage Act clearly lays out the responsibilities for preparing the Plan, but this is not explained in the document itself. The introduction would have been a useful place to explain the process, authorship and responsibilities of the Steering Committee.²⁸

²⁶ CoRBA, 6 August 2011.

²⁷ CRA, 8 August 2011.

²⁸ National Trust of Australia (Victoria), 9 August 2011.

In respect of the relationship between various parts of the documents suite, Australia ICOMOS expressed concern that

The complexity that comes with the range of plans has the potential to cause confusion as time goes on. The range of attachments (plans), with varying dates of adoption and review, suggests that there is a likelihood that inconsistency could be created between documents.²⁹

Finally, a number of parties wanted the Committee to create an ‘action plan’ which identified and prioritised the works to be undertaken.

2.8 Conservation Management Plan (CMP) (Attachment A).

The content of the CMP was the subject of comment from the City of Melbourne, which noted that:

The Conservation Management Plan (CMP) was prepared in 2008, and even in that short time, some of the descriptive information about the Gardens is out of date, which in turn means that some of the specific policies are out of date, as certain recommended actions have been completed. For example, Policy 8.6.5 – the Parterre Bed reconstruction is now finished and Council is finalising a maintenance plan for the beds. Works relating to Policy 8.5.13 (relocation of the depot in the northern gardens) and 8.5.10 (palisade fence, gates and plinth) have also been completed.³⁰

The City of Melbourne’s submission goes on to propose other changes to the CMP.

it would be useful for some key ‘heritage impact’ indicators to relevant major events to be listed in the CMP. For example, in the current management of the MIFGS the key matters addressed annually are primarily focused on tree protection, soil compaction, and general best practice systems for show bump in and bump out and management of the event itself. These are all important however one matter that is commented on regularly by the general public, but falls outside the scope of these arrangements, is the visual impact on the lawns resulting from MIFGS and the re-instatement of the lawn areas in South Gardens after the event. While the most rapid way to re-establish lawn using instant turf is specified, it can take two months for the lawns to come back to the usual level of presentation, and in the interim presents a patchwork of brown and different shades of green, with significant areas roped off from public use. This affects the overall visual presentation of the site and accordingly may not be consistent with the “views and vistas” policy at 4.2; however it is hard to assess this without more specific guidelines or indicators in place.³¹

²⁹ Australia ICOMOS, 8 September 2011.

³⁰ City of Melbourne, August 2011.

³¹ City of Melbourne, August 2011.

2.9 Carlton Gardens Master Plan (Attachment B)

The Carlton Gardens Master Plan was criticised by the National Trust, which described it as ‘out of date and incomplete in places’ and went on to highlight what it believed to be the Master Plan’s shortcomings. These included the inconsistent date of various documents attached to the Master Plan and the need to update the Plan to reflect the removal of several trees and the completion of various works.³²

2.10 Royal Exhibition Buildings and Exhibition Reserve Master Plan (Attachment C)

The National Trust also criticised some elements of the Royal Exhibition Buildings and Reserve Master Plan:

This Plan includes some recommendations already undertaken or underway (the restoration of the west forecourt and the water harvesting program and preparation of a maintenance plan).³³

In addition, the Trust expressed concern about what it saw as the Master Plan’s prioritisation of improving vehicular access over the restoration of the south drive and eastern forecourt, and the various features within the eastern forecourt – lamps, statuary, paving and gates.

As already noted, the issue of car-parking was also raised by a number of other submitters, for example in the oral submissions of the FRA and the written and oral submissions of Ms Guantai.

2.11 Royal Exhibition Building and Carlton Gardens World Heritage Management Plan World Heritage Environs Area (WHEA) (‘Buffer Zone’) Strategy Plan (Attachment D)

Comments were also received in relation to the World Heritage Environs Area, or ‘Buffer Zone.’ The City of Yarra noted that it was pleased to see the World Heritage Environs Strategy Plan form part of the Management Plan. However, it was of the view that there was a need for ‘ongoing monitoring, review and reporting in relation to the World Heritage Environs Area’.³⁴

The submission lodged by the FRA made particular reference to the Buffer Zone and in oral submissions; Mr Lynch drew the Committee’s attention to the current development of the ‘Hub’ complex on Nicholson Street. Mr Lynch saw the Hub re-development as detracting from the heritage values of the Royal Exhibition Buildings and Carlton Gardens and was concerned about the threat posed by the re-development of other significant sites within the Buffer Zone more generally. In oral submissions FRA commented that:

Significant built heritage has been lost since the declaration of the WHEA and after the approval of the WHEASP. Examples are failure (through oversight) to include a ‘C’ graded 1915 building (known as 95A Rathdowne Street, part of the Deaconesses Missionary Institute in the old Gaelic Church precinct) in the Heritage Overlay which ultimately led to its demolition in 2010.³⁵

³² National Trust of Australia (Victoria), 9 August 2011. The Committee notes that a number of the assertions made in the Trust report in relation to the Master Plan are not accurate. However, it has given proper consideration to those that are and the recommendations that follow reflect the Trust’s input.

³³ National Trust of Australia (Victoria), 9 August 2011.

³⁴ City of Yarra, 19 August 2011.

³⁵ FRA.

Other submissions relating to the WHEA area were lodged by Residents 3000 which stated:

*We are well aware of the disappointment of locals about the Hub development. Frankly anyone who values the site would be more than disappointed. HV should set in place what can be done about such threats to the environs before they happen. This could be discussed with City of Melbourne and also City of Yarra. Can any corrective actions be taken in these-instances?*³⁶

2.12 Relationship between the Suite of Documents

Concern was expressed by Australia ICOMOS that the statutory framework outlined in Section 8 of the Management Plan did not contain specific reference to the EPBC Act and Regulations, which are 'elsewhere noted in Section 1 Introduction'. Australia ICOMOS goes on to suggest that the relationship between Commonwealth and State legislation needs to be clarified within the context of the Plan and suggests that a brief discussion of the relationship between 'UNESCO and Australia as a state party, and what obligations this does – and perhaps more importantly – does not create on the site managers', would also be of benefit.³⁷

2.13 Legislative Revisions

In addition to raising issues about the day-to-day management of the Carlton Gardens, submitters drew the attention of the Steering Committee to legislative revisions which they felt were necessary to better protect the heritage values of the Place.

The City of Melbourne's submission expressed concern about the capacity of the Governor in Council to approve events which may be inconsistent with the values of the Royal Exhibition Building and Carlton Gardens:

*The Crown Lands (Reserves) Amendment (Carlton Gardens) Act 2008, Part 4A Carlton Gardens Reserve – Special Event Management, allows for the Governor in Council to declare that "an event or series of events deemed to be of significance to the State to be held in Carlton Gardens Reserve, and appoints the Melbourne Convention and Exhibition Trust to manage the declared Event".*³⁸

The City of Melbourne argues that with the 'preparation of the World Heritage Management Plan to guide the future direction and management of the site, it could be argued that Part 4A and the amendments to the Crown Land (Reserves) Act made by it are now obsolete'.³⁹

The City of Melbourne's submission concludes that retaining Part 4A in its existing form 'has the potential to confuse the overall objectives and purposes of the World Heritage Management Plan as Part 4A refers to ANY event deemed to be of state significance, involves temporary removal of the Council as Committee of Management under certain circumstance and it does not recognise the World Heritage status of the site'.⁴⁰ Similar concerns were raised in the submission of Mr Bandt.⁴¹

³⁶ Residents 3000, 5 August 2011.

³⁷ Australia ICOMOS, 8 September 2011.

³⁸ City of Melbourne, 11 August 2008.

³⁹ City of Melbourne, 11 August 2008.

⁴⁰ City of Melbourne, 11 August 2008.

⁴¹ Adam Bandt MP, 8 August 2011.

Other legislative issues identified related to what was perceived to be a complex relationship between the various bodies responsible for managing the Place. In this regard the PPL commented

At present, part of the Place is managed by the City of Melbourne (namely the north and south gardens) while the centre of the site and the Royal Exhibition Building is managed by Museum Victoria.

In PPL's submission, the management of the place should be under the auspices of one entity to ensure a consistent approach is adopted to the management and conservation of the place.⁴²

2.14 Typographical and Factual Errors

A number of submitters identified typographical errors and what they believed to be factual inconsistencies in the suite of documents. These are not identified in detail in the summary, but the draft Management Plan has been checked and, where necessary, changes have been made.

⁴² PPL, 9 August 2011.

3 COMMENTARY AND RECOMMENDATIONS

3.1 Management and Presentation of the Carlton Gardens

It is the Committee's view that the CMP provides an appropriate and balanced way of managing the Place. Accordingly, the Committee endorses the content of the CMP, including the text outlined in red.

As detailed in the CMP, it is the opinion of the Steering Committee that the holding of commercial, ticketed or fee-for-entry events within the Carlton Gardens, the Royal Exhibition Building or the Exhibition Reserve is not incompatible with the world, national or state heritage values of the site, as the short-term exclusion of residents, visitors and tourists during specific exhibitions and events has been a feature of this World Heritage site since the 1880 International Exhibition. The Committee also notes that such ticketed activities are common in World Heritage Sites within Australia and internationally. In this regard, it was the Committee's view that MIFGS should be assessed against the same criteria as other events, uses and activities on the site noting that the staging of MIFGS and other commercial and non-commercial events is a contemporary continuation of the international exhibitions of the second half of the nineteenth century.

While the Committee recognises the historic role of such events, it also appreciates that there is a need to balance the role of the Place as an exhibition space with its function as a recreational space. Accordingly, while the Committee supports the holding of such events it is of the view that major events should occupy either the North Carlton Gardens (and Exhibition Reserve) or the South Carlton Gardens (and Exhibition Reserve), but not both simultaneously.

The Committee is also concerned to ensure that the impact of such events upon the Gardens is minimised. Heritage Victoria permits and a heritage impact assessment statement should always be required for major events, and the decision on whether to issue a permit and permit conditions should be based upon consideration of the policies outlined in the CMP. Monitoring will be required before, during and after a major event. Permits should not be issued for activities which have the potential to irretrievably damage the significant fabric (hard and soft landscape elements) of the Gardens.

Further, to assess the cumulative impact of holding such events in the Gardens, the City of Melbourne should continue to conduct regular assessments of tree health in both the North Carlton Gardens and the South Carlton Gardens. The assessments should take place at no greater than 24 month intervals. Once completed, the assessments should be available in the public domain.

The Steering Committee notes that data provided by the City of Melbourne indicated that the lifespan of avenues of trees in the North Carlton Gardens was generally expected to be shorter than those in the South Carlton Gardens. The Committee also recognises that while the trees are now mature, in the latter part of the nineteenth century, the character of the Carlton Gardens was defined by relatively immature plantings. As such, in the Committee's view, the removal of severely damaged or dying trees and their replacement with juvenile specimens of the same species would not necessarily detract from the significance of the Place. In the Committee's view, when an avenue has lost such a number of trees, it no longer retains a sense of visual continuity; it should be replaced in its entirety.

The desire of several submitters to reinstate all, or part of the iron palisade fence around the Carlton Gardens was also noted by the Committee. In this regard, the Committee observes that the Management Plan does not preclude a reconstruction of all or part of the fence or gates at a later date.

RECOMMENDATIONS

1. Where consistent with the CMP and this Management Plan, major events should continue to be held at the Place.
2. Major events which involve the wider gardens outside the Exhibition Reserve should take place either in the North Carlton Gardens (and Exhibition Reserve), or the South Carlton Gardens (and Exhibition Reserve) but should not simultaneously occur in both the North and South Carlton Gardens.
3. At its next review of the Carlton Gardens Master Plan, the City of Melbourne consider removing specific reference to the Melbourne International Flower and Garden Show (MIFGS) from section 3.4.2 (Uses and Activities; Events).
4. Heritage Victoria permits and a heritage impact assessment statement should always be required for major events affecting the Carlton Gardens, and the decision on whether to issue a permit and permit conditions should be based upon consideration of the policies outlined in the CMP. Monitoring will be required before, during and after a major event.
5. The City of Melbourne should continue to undertake periodic assessment of tree health. The assessment should take place at no greater than 24 month intervals. Once completed, the assessment should be available in the public domain.
6. Where avenues of trees are wholly, or partially, senescent or have lost such a number of trees that they no longer retain a sense of visual continuity, the avenue should be replaced in its entirety. Subject to availability and environmental considerations every effort should be made to replant in the same species.

3.2 Management and Presentation of the Royal Exhibition Building and the Exhibition Reserve

The reinstatement of the Dome Walk is recognised as a highly desirable outcome to promote the World Heritage Site. It is noted that specific reference to the intention to provide 'dome promenade tours' and to refurbish the walk to enhance the visitor and interpretative experience is provided in the Royal Exhibition Building and Exhibition Reserve Master Plan (section 5.3.2, Interpretation within the Building; and Figure 4, Objectives for external areas of REB).

The Committee notes concerns raised at the new plantings within the Exhibition Reserve but does not believe that these trees, which are part of a more contemporary designed landscape, detract from the views and presentation of the Royal Exhibition Building or the understanding and legibility of the wider site and its World Heritage values. The health of these trees should be monitored in the same way as the trees within the Carlton Gardens.

The Committee also notes that a number of submitters were unhappy about the location of car parking and disposal facilities so close to the Royal Exhibition Reserve. While there is an obvious need for these facilities at the Place, the Committee is of the view that Museum Victoria, as managers of the Exhibition Building, should investigate their removal to protect key vistas to the Royal Exhibition Building.

RECOMMENDATIONS

- 7. Museum Victoria explore the reinstatement of the Dome Walk, as and when appropriate funding becomes available.**

- 8. The health and longevity of the trees within the Exhibition Reserve be assessed using the same methodology and at the same time as those in the Carlton Gardens.**

- 9. Museum Victoria review the areas identified for car parking, temporary storage and waste facilities (bins and skips etc) immediately adjacent to the REB and within the Exhibition Reserve. This should be done in the context of protecting key views and vistas of the REB including the formal entrances and views from the major avenues and paths, and minimising on-grade car parking.**

3.3 Interpretation

The interest of submitters in the level of promotion and quality of interpretation of the Place was noted by the Committee. In response the Committee will revise and enlarge section 10 (Interpretation) of the Management Plan, with particular reference to opportunities for interpretation outside the confines of the World Heritage site itself and those options not articulated in the CMP (Section 6.5, Interpretation and Signage); Carlton Gardens Master Plan (section 3.8, Interpretation) and the Royal Exhibition Building and Exhibition Reserve Master Plan (sections 5.3, Interpretation; 5.5, Communications and Promotion; and 5.6 Signage Strategy). In order to bring together all the information in relation to the Place, the Committee recommends that Museum Victoria, the City of Melbourne, Heritage Victoria and the Commonwealth work together to establish a single website for the Place. The website would contain historical information, information on events and activities, as well as copies of various management documents. Other opportunities for the interpretation of the Place may be provided by the City Circle Tourist Tram, the 96 tram, the Golden Mile Walking Tour, recently launched Heritage Victoria iPhone app and the future reinstatement of the Dome Walk.

Within the context of the Place's interpretation, the Committee specifically recognises the importance of commemorating the anniversaries of significant events that occurred at the Place, for example the founding of the first Australian Parliament on 1 January 1901, or the World Heritage-themed *International Sites and Monuments Day* on 18 April 2012.

RECOMMENDATIONS

- 10. Museum Victoria, with input from the City of Melbourne, Heritage Victoria and the Commonwealth create a single website for the Place. This website should contain historic material, information on events and activities and interpretative and educational material as well as copies of the various management plans and other statutory information.**

- 11. Opportunities to promote the site on significant anniversaries be taken by the City of Melbourne and Museum Victoria, an example being an annual celebration or promotion of the founding of the first Australian Parliament at the Royal Exhibition Building on 1 January 1901 or the upcoming World Heritage themed *International Sites and Monuments Day* on 18 April 2012.**

3.4 The World Heritage Emblem

The Committee notes that use of the various versions of the World Heritage emblem will assist in the promotion of the Place as a site of International significance.

RECOMMENDATIONS

- 12. The use of the World Heritage emblem be encouraged on signage and published information associated with the Place. Use of the emblem should be governed by the *World Heritage Emblem Guidelines for use in Australia*.**

3.5 Composition of the World Heritage Steering Committee

The Committee does not consider it necessary that a single management agency comprising of Commonwealth, State and Local Government be established, but recommends that the Steering Committee continue to meet periodically outside the current World Heritage Management Plan process. It is noted that many individual World Heritage sites are successfully managed in partnership by a number of private individuals, organisations and public agencies. The Committee does, however, accept that the relationship between the various management agencies could be better explained and recommends that a diagram outlining the relationship between each management and regulatory agency be included in the Management Plan.

The Committee also recognises the benefits that greater community involvement in the management of the Place will bring. Accordingly, it proposes that two Community Advisers be appointed by the Committee to assist in its future deliberations. The first Adviser would be an officer of the City of Yarra, appointed, by the Committee, on the recommendation of the CEO. The second Adviser would be a member of the public, appointed, by the Committee, on the recommendation of the CEO of the National Trust of Australia (Victoria). The Community Advisers would be appointed shortly after the Minister's appointment of each new Steering Committee. The terms of the Community Advisers would end with those of the Committee that appointed them or, after the resignation of two or more members of the Committee, or upon the resignation of the Advisor. If a Community Advisor position became vacant and more than six months of the Committee's term remained, the Committee would be obliged to seek to appoint another member on the advice of the CEO, City of Yarra or the CEO, National Trust as appropriate. The role of Community Advisers is to assist the Committee in its deliberations. Community Advisers are not members of the Committee for the purposes of the Heritage Act. As such, they would not count towards quorum, be empowered to vote at Committee meetings or be able to make representations on behalf of the Committee.

The Management Plan establishes working relationships between the management bodies and sets parameters within which the Place is to be managed. The Committee recognises that the relationship between the City of Melbourne and Museum Victoria is also mediated by a Memorandum of Understanding (MOU) dated 1 June 2004. The Committee notes that both Museum Victoria and the City of Melbourne support the retention of the MOU in its existing form and that the MOU was not raised as an issue of concern by any party to the hearing. The Committee has no objection to the retention of the MOU, provided that it is recognised that the Management Plan is the primary tool for managing the cultural heritage values of the place and that in the event of any inconsistency between the Management Plan and the MOU, the Management Plan should prevail. Any future MOU between the parties should be developed within the context of the Management Plan and should not be inconsistent with the Management Plan.

RECOMMENDATIONS

13. **The draft Management Plan be amended to include a diagram of the relationships between each management and regulatory agency for the World Heritage site and descriptive text be provided on the role of the Steering Committee.**

14. **The Committee be empowered to appoint two Community Advisers. The first would be an officer of the City of Yarra, appointed, by the Committee, on the advice of the CEO. The second would be a representative from the National Trust of Australia (Victoria) appointed, by the Committee, on the advice of the CEO. Advisers would be able to participate fully in the operation of the Steering Committee, but would not be empowered to vote at Committee meetings, to make representations on behalf of the Committee or to count for the purposes of quorum. The terms of the Advisors would end upon their resignation, or with those of the Committee that appointed them or, after the resignation of two or more Committee members of the Committee. If an Advisor position became vacant and more than six months of the Committee's term remained, the Committee would be obliged to seek to appoint another member on the advice of the CEO, City of Yarra or the CEO, National Trust as appropriate.**

3.6 Community Engagement

An annual information session could provide a summary of the state of the World Heritage site and the community could be given the opportunity to submit questions on topics of specific interest prior to the meeting to enable informed responses to be provided.

RECOMMENDATIONS

15. **A public information session be held annually (or more frequently if the Committee believed that it was required) providing an update on the World Heritage site management and giving the community an opportunity to raise issues of interest to them.**

3.7 World Heritage Management Plan – Consultation and Preparation

The purpose of the World Heritage Management Plan is to define the World Heritage and other values of the site and establish a framework for the management of the Place. As a management tool, the Management Plan should reiterate the obligations that the Australian Government has as a States party under the UNESCO World Heritage Convention and also the responsibility that the Victorian Government, the Melbourne City Council and the various managers of the Place have for its preservation.

The Committee has considered those submissions relating to the Statement of Universal Values (SOUV) and the creation of an 'action plan' to indicate the priority and timing of future works. In relation to the SOUV, the Committee notes the typographical error on page 7 and recommends that it be amended to read 'The Melbourne Museum was opened in 2000 to the north of the Royal Exhibition Building'. The Commonwealth's copy of the SOUV should also be checked and, if necessary, amended as indicated above. Once amended, the SOUV should be incorporated as a reference document into the Melbourne Planning Scheme.

In relation to the 'action plan', in the Committee's view, such a plan would not be of benefit because the timing of potential future major works (e.g. reinstatement of the Dome Walk) will depend on future funding and operational priorities. In order to clarify the approvals process for major works, the Committee does, however, recommend that a new 'Statutory Framework' section be added to the Management Plan. The section should outline the approvals process under the EPBC Act.

The Committee notes that there was criticism of the level of consultation with both the broader and Indigenous communities during the preparation of the Management Plan. In relation to the consultation process generally, the Committee has reviewed the process against the statutory requirements within the Division 3, Part 3A of the Act and can confirm that it meets, and indeed exceeds, the requirements for public notification and consideration of submissions.

In relation to the Indigenous community specifically, the Committee notes that at present there is no Registered Aboriginal Party (RAP) for the Place under the *Aboriginal Heritage Act 2006*. If, in the future, an RAP is appointed then the Committee recommends that section 6.1 of the Management Plan be amended to identify the RAP (or RAPs) as the traditional owners of the land and that the RAP or RAPs appointed should be contacted in relation to the development of future Management Plans for the Place.

The Committee also notes that there was some criticism that submissions from individual parties were not available to be viewed prior to the hearing. To ensure that the process remains as transparent as possible, the Committee therefore recommends to the Minister for Planning that submissions made to the Committee be released on-line, providing that consent can be obtained from their authors. A copy of this report should also be released.

Finally, now that the draft document has been completed the Committee recommends that the Minister approves the Management Plan and communicates it to the [Hon Tony Burke MP] Federal Minister for Sustainability, Environment, Water, Population and Communities requesting that it be provided to the UNESCO World Heritage Centre in Paris. In accordance with statutory obligations, the Management Plan should be reviewed by the Steering Committee again in 2017.

RECOMMENDATIONS

16. The Management Plan be amended to clarify the status of the Australian Government as the States Party under the UNESCO World Heritage Convention and descriptive text be included to describe the obligations that are placed on the Commonwealth, state and local governments and the site managers.
17. The City of Melbourne amend the Melbourne Planning Scheme to make the Statement of Outstanding Universal Value (SOUV) a reference document once it is formally adopted. A footnote will be added to the Management Plan explaining that the SOUV was prepared retrospectively and that it is anticipated that it will be considered by the UNESCO World Heritage Committee in mid-2012.
18. The typographical error in the draft SOUV on page 7 of the Management Plan be corrected to read 'The Melbourne Museum was opened in 2000 to the north of the Royal Exhibition Building'. The Committee also recommends that the Commonwealth amend the formal SOUV if this error exists in the original document as well.
19. A new subsection be added to Section 8 (Statutory Framework) which outlines the assessment and approval processes under the EPBC Act. The Committee considers that the current statutory notification periods within the EPBC Act and the Heritage Act are adequate and do not need to be increased as a result of the Place's World Heritage status.
20. If a Registered Aboriginal Party (RAP) is appointed under the *Aboriginal Heritage Act 2006* then section 6.1 of the Management Plan should be amended to identify the RAP (or RAPs) as the traditional owners of the land.
21. Submissions made to the Committee be released on-line, providing that consent can be obtained from their authors. A copy of this report should also be released.
22. The Minister for Planning approve the adopted World Heritage Management Plan as amended by the Committee and transmits it to the [Hon Tony Burke MP], Federal Minister for Sustainability, Environment, Water, Population and Communities requesting that it be provided to the UNESCO World Heritage Centre.
23. The Management Plan be reviewed by the Steering Committee at the time of the preparation of Australia's third World Heritage Periodic Report in 2017.

3.8 Conservation Management Plan (CMP)

RECOMMENDATIONS

24. The amendments highlighted in red within the CMP be adopted.
25. The CMP be updated to reflect recent works, namely the German Circle in the western forecourt, the Parterre Garden reconstruction (Policy 8.6.5) the relocation of the works depot (Policy 8.5.13) and the partial reconstruction of the palisade fence and gates (Policy 8.5.10).
26. An error on page 116 regarding the playground that has been removed be corrected. Policy 8.5.8 should be amended to reflect the potential for the reinstatement of the former lake in the North Carlton Garden with the relocation of the play area to a less intrusive site nearer to the Melbourne Museum building.
27. The CMP be updated to reflect the recognition on the Victorian Aboriginal Heritage Register of parts of the Carlton Gardens as Aboriginal meeting places.
28. A number of postcard images of the World Heritage Site that were provided to the Steering Committee be incorporated into Appendix F (Historic Images) of the CMP (Part 2 – Appendices), subject to copyright restrictions. All photos, images, plans and drawings should be dated where known.
29. The CMP be reviewed by Museum Victoria and the City of Melbourne at the time of the preparation of Australia's third World Heritage Periodic Report in 2017.

3.9 Carlton Gardens Master Plan

RECOMMENDATIONS

30. The Carlton Gardens Master Plan be reviewed by the City of Melbourne at the time of the preparation of Australia's third World Heritage Periodic Report in 2017.

3.10 Royal Exhibition Building and Exhibition Reserve Master Plan

RECOMMENDATIONS

- 31. The Royal Exhibition Building and Exhibition Reserve Master Plan be reviewed by Museum Victoria at the time of the preparation of Australia's third World Heritage Periodic Report in 2017.**

3.11 Royal Exhibition Building and Carlton Gardens World Heritage Environs Area (WHEA) ('Buffer Zone') Strategy Plan (Attachment D)

The Committee notes the comments made about the need for the elements within the World Heritage Environs Area (or 'Buffer Zone') to be identified and recorded. The Committee stresses that the Buffer Zone does not demonstrate World Heritage Values itself but rather provides the urban context within which the World Heritage Site is located. The World Heritage Strategy Plan (approved by the Minister for Planning on 21 October 2011) which informed the Buffer Zone adopted by the UNESCO World Heritage Committee at its 34th session in Brasilia in 2010 is considered to provide a comprehensive assessment of the built environment adjoining the World Heritage Site.

The Steering Committee recognises that development will continue to occur within the Buffer Zone. It notes that any proposed action (including development) that will have a significant 'impact' as defined by the EPBC Act will require approval from the Federal Minister administering that Act, unless it is the subject of some form of exemption. In addition, any local or State Government planning or heritage decision is required to take account of the World, national, state and local listing of the Place. The Committee is of the view that the EPBC Act approvals process, together with the additional planning controls including the Municipal Strategic Statements, Heritage Overlays and Design and Development Overlays given affect to in the Melbourne and Yarra Planning Schemes, as approved by the Minister for Planning provides a strong basis for the management of the cultural heritage values of the Place at a local and national level. To ensure that Heritage Victoria is also made aware of all significant developments within the most sensitive parts of the Buffer Zone, the Executive Director, Heritage Victoria has undertaken to seek notification, from the City of Melbourne and the City of Yarra, of any permit application that involves the demolition or removal of a building or any part of a building within the area of Greater Sensitivity, as defined in the Strategy Plan.

The Committee is, also aware that the Strategy Plan does not currently contain details of significant buildings within the Buffer Zone. The Committee believes that this information would be a useful reference tool. Accordingly, it will work with Heritage Victoria to create a schedule relating to each place within the Buffer Zone that is part of a Heritage Precinct, the subject of an individual local Heritage Overlay control, or that is included on the Victorian Heritage Register. The resulting document should be formally added as an Appendix to the World Heritage Strategy Plan when it is reviewed in 2017.

It is the Committee's view that the World Heritage Strategy Plan, like the CMP, the Carlton Gardens Master Plan and the Royal Exhibition Building and Exhibition Reserve Master Plan should be reviewed in 2017, at the same time as the Management Plan within the broader context of Australia's World Heritage Periodic Reporting.

The City of Melbourne-wide tree health survey is welcomed for the information that it provides on the identification, health and likely longevity of the street and park plantings within the Buffer Zone.

RECOMMENDATIONS

- 32. The World Heritage Strategy Plan be reviewed by the Steering Committee at the time of the preparation of Australia's third World Heritage Periodic Report in 2017.**

3.12 Relationship between the Suite of Documents

The Committee acknowledges there is a level of duplication, especially in the statutory requirements, within the Management Plan and its supporting plans, but this is considered appropriate given that these documents are also read alone. The Committee also acknowledges that the dates identified on the Management Plan and its various components should be consistent.

RECOMMENDATIONS

- 33. That dates identified in the Management Plan and its various components be edited to ensure consistency.**

3.13 Legislative Revisions

The Committee noted the submission from the City of Melbourne, which identified that the specific provisions within the *Crown Lands (Reserves) Act 1978* as amended in 2008 may not be consistent with the Australian World Heritage Management Principles.

RECOMMENDATIONS

- 34. The Victorian Government amend Part 4A of the Crown Lands (Reserves) Act to make specific reference to the World Heritage Site. These amendments should include sections that require:**
- **Decisions made under Part 4A to take account of any potential impacts on the World Heritage values of the site;**
 - **Actions to be consistent with the CMP, the World Heritage Management Plan and the Australian World Heritage Management Principles; and**
 - **The relevant Commonwealth and State Government approvals are sought and obtained in advance of any activity, event or associated works.**

3.14 Typographical and Factual Errors

RECOMMENDATIONS

- 35. The typographical and factual errors identified through the public submission and hearing process be corrected in the adopted draft Management Plan.**

3.15 Approvals Bilateral Agreement

Bilateral agreements allow the Commonwealth to 'accredit' particular environmental, heritage and planning assessment processes and approval decisions. Entering into an Approvals Bilateral Agreement for the Place would allow the Commonwealth to delegate to the State of Victoria the responsibility for conducting environmental (heritage) approvals under the Commonwealth EPBC Act for the Royal Exhibition Buildings and Carlton Gardens if the proposed activity or works is in accordance with the Management Plan. In the Committee's view, entering into such an agreement would centralise and simplify the management process for the Place. Accordingly, the Committee recommends that the Minister liaise with [Tony Burke MP], the Federal Minister for Sustainability, Environment, Water, Population and Communities with a view to executing an Approvals Bilateral Agreement.

RECOMMENDATIONS

- 36. After the approval of the World Heritage Management Plan that the Minister write to the Federal Minister requesting that the Commonwealth Government enter into an Approvals Bilateral Agreement with the State of Victoria under the Commonwealth EPBC Act.**