## Yarra City Council's response to the draft Heritage Management Plan for Royal Exhibition Building and Carlton Gardens:

Yarra City Council (YCC) appreciates the opportunity to provide a feedback to the draft Heritage Management Plan for the Royal Exhibition Building and Carlton Gardens (REB&CG) and includes feedback from Council's Heritage Advisory Committee, in making this response.

YCC recognises that the draft HMP currently on consultation is an improved version of the earlier Conservation Management Plan (CMP) for the REB &CG. It incorporates more up-todate statutory and descriptive/physical information about works which have occurred, or are underway, and includes additional historical information, graphics and an updated Bibliography.

YCC notes that this review process proposes a separate consultation with the Aboriginal community and preparation of an independent document post that consultation which would identify the cultural values of the Aboriginal community to the world heritage site of REB&CG. YCC, recognises that this approach has resulted in an area of gap in the proposed draft HMP which needs to be addressed and the HMP should be updated based on the findings of the consultation before a revised WHMP is prepared.

It is understood that the WHEA Strategy Plan is currently being reviewed and a revised document would make recommendations on an appropriate framework (including planning tools/instruments) for future protection of significant views to and from REB&CG that affect World Heritage Environs Area (WHEA). The recommendations in section 3.8 of the current draft HMP respond to the existing WHEA Strategy Plan and the current planning framework. It would be important that management recommendations and policies on views and vistas to and from WHEA in Section 3.8 of the HMP are consistent with the recommendations of revised WHEA Strategy Plan and the two documents, the HMP and the WHEA Strategy Plan, complement each other. YCC therefore recommends review and revision of section 3.8 of the draft HMP when the WHEA Strategy Plan has been revised.

YCC, in general supports other aspects of the draft HMP as it provides a more direct and specific guidance on various elements within the world heritage site - REB&CG and includes rationale behind that, however, YCC also raises following points as general suggestions for improving the document:

- 1. Section 3.10 on interpretation appears limited in scope. The rationale can also elaborate on educational values of interpretation and implementation actions or strategies can include use of latest technology and media. Further, this section should have a discussion on opportunities for the interpretation of the site within the broader setting of WHEA and its 19 century context.
- 2. Section 4.8.6 is limited to vehicle movement and car parking only. There is a need to look into aspects of bicycle access, movement or bicycle parking.
- 3. There are a number of recommendations relating to risk and preparedness. It is not clear whether this is based on the historical data and costs for risk mitigation in the past.
- 4. The headings and structure of the report can be rationalised and the duplication can be removed. For example:

- (a) The overview description such as under item 2.0 *Heritage Place* can also be included for other chapters;
- (b) The subheading *Introduction* (item 3.1), under chapter 3- Conservation Policy, could be changed or removed completely as the document already has a main heading as *Introduction* (item 1.0); and
- (c) The subheading 3.1.4 chapter 4 can be renamed and description under this is reframed.

Further, YCC also identifies that there is a need that the WHMP illustrate relationship between its various component documents including HMP clearly, possibly through a diagram (flow chart) and also briefly describe what these documents contain so that the reader of the document can understand what type of information is available in documents such as the HMP.