

CoRBA - Melbourne
Coalition of Residents and Business Associations

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14 April 2016

Hon. Greg Hunt MP,
Minister for the Environment,
Department of the Environment,
Australian Government,
P.O. Box 787
Canberra ACT 2601

Dear Minister,

Please find our submission, which we feel has significant impact on a matter protected by the EPBC Act 1999.

INVITATION FOR PUBLIC COMMENT ON REFERRAL

EPBC Case Title: Museum Victoria/Tourism and Recreation/Carlton Victoria/Royal Exhibition Building Protection & Promotion Project
EPBC Number: 2016/7680 Date of Notice: 31/03/2016

SUMMARY OF OUR RESPONSES TO PROPOSED ACTIONS IN THE REFERRAL NOTICE

This project will largely continue with the commercial event and function model rather than develop and showcase the World Heritage values and its place in Australian history.

We don't object to the promotion works referred to in Stage 1.

However, we are concerned that the promotion works, that were a large part of the reason for the funding allocation, have not been addressed.

We ask the Minister to not approve stage 2 works.

We are concerned there is no plan for the Royal Exhibition Building history story in the project.

Such a plan would be fundamental to delivery of all the elements expected in the outcome description, signage, democracy education centre, annual celebration of first Australian parliament and recognition of the indigenous relationship with the site. All we note is an area in the basement labelled as interpretation. In stage 2 this area seems to be redesigned as the kitchens.

RESPONSE TO PROPOSED ACTIONS

Intentions of the funding: description of purpose of budget allocation

This referral notice to the Minister under the EPBC Act, is effectively seeking approval for development over phases 1 and 2. The application will include some substantial design and building elements that will not be built, in phase 1. Phase 1 is that part of the proposed

development that is to be funded from the \$ 20 million allocation. No budget proposals have been submitted for the funds for phase 2. Museum Victoria (MV), with the design team, has made decisions on what is affordable with current funds. We understand the project outline and design drawings as follows:

- The decision has been taken not to undertake ‘preservation’ works on the north wall of the REB. While the west, south and east walls are deemed to require attention. The north wall, last repaired at the same time as the other walls, is not.
- 2/3 of the federal grant is to be directed to ‘preservation’ of the REB and 1/3 to ‘promotion’. The promotion budget is largely work to activate the Dome Walk.
- A large cafe is to be built at ground level, against the REB’s south west wall and into the southern promenade.
- A pavilion is to be built on the REB roof at the parapet level above the REB’s grand southern promenade entrance. It is to have glass walls, a roof, and heating, in phase 2. The structure will, be visible from the gardens and further afield.
- Both of the Museum proposals (i.e. the café and the pavilion) are factored into the project plans indicating that the Museum is apparently prepared to divert ‘preservation’ funds to construct commercial structures.
 - With these additional facilities, the Museum, will increase its hospitality and event revenue by creating additional spaces for hire at ground and basement levels as well as the roof level.
 - It would be fair to say, the grant was not for this purpose.
- There is no information on the interpretation and museum elements. However, there is space described as interpretation in the public access areas leading to the dome.
 - The Museum appears to have provided no ‘brief’ to present information about the social significance of the REB.
 - This news was disappointing given public access to the REB and dome and interpretation of the building’s history, had been a key priority in lobbying for budget funding.

Given the requirement to adhere to the purpose of a budget appropriation, the deviations in the development proposal, should invite questions from Heritage Victoria, as permitting authority, and the federal government, in relation to WH values’ obligations in the EPBC Act, and also from the public, if they knew.

The decision to down grade the museum and interpretive elements in the budget papers, seems oddly contrary to the educational role any Museum has in the community and especially, the REB, as Museum Victoria’s principal archive. For the public, this decision means the lost opportunity for visitors to the REB and dome to learn the story of the REB.

Case to review the world heritage plan

From a policy perspective, a case could be put that, by including external structural additions to the REB – the café and pavilion - that are not in the Conservation Management Plan or in the Master Plan for the REB / Museum reserve, this part of the application should not be approved by the Minister. Reviews of the CMP and REB/Museum master plan are proposed for 2017.

Assessment of the actual outcomes from the proposed P&P project.

We object to the priorities, some significant aspects of the design works, the negative impact of new constructions on the heritage buildings, the impact on heritage views of the REB from various

public view lines, the limited public access to the REB, and the lack of interpretation plan or proposal for REB history museum.

Related to those concerns, is our conclusion that the public's REB experience will be considerably limited from that proposed in the budget description. Perhaps the public's access and experience will be even further reduced by the commercial events' activities in and around the REB.

OPPORTUNITIES MISSED TO ADVANCE WH AND NATIONAL HERITAGE VALUES

This project promised to put the REB on a new heritage values' focused trajectory for its future. Yet, in our view, while it does deliver improvements, some of these are presented in a less than optimal way. Moreover, this project presents as a lost opportunity. Our reasons for this view are numerous and are detailed in the detailed submission. By way of example:

The project plan describes the principal promotion outcomes as the *Dome experience* rather than the *REB experience*. This exemplifies the limited benefits from the funding for the REB's return to its iconic position in the *Marvellous Melbourne* period and its proper recognition as the birthplace of the Australian nation.

In our view the expectation that the majority of the funding should be shifted to conservation and protection, of the REB, is short-sighted. At its best, this funds shifting, only delays the need to set up ongoing financial and management systems to secure the REB's future. The price paid, is the lost opportunity, with the REB centre stage as the Museum's largest archive, and where the reopening of the dome walk is part of the larger REB story, told within the building - a museum in its own right. And moreover, the visitor numbers might surprise, and entry fees might generate a much sought after substantial cash flow.

DEVALUED THE PUBLIC INTEREST WHILE ENTRENCHING THE PRIMACY OF COMMERCIAL INTERESTS AS A REVENUE SOURCE

This project will largely continue with the commercial event and function model rather than develop and showcase the REB's world heritage values.

In our view, the intention of the specific funding was to redress the poor public understanding of the significance and history of the REB and to improve public access. Since MV moved to the site next to the REB in 2000, the priority has been on the REB to generate income as a commercial event venue. The regular commercial events have dominated the REB's uses and severely restricted public access and interpretation of the REB stories.

DEFICIENCIES IN COMMUNITY ENGAGEMENT AND IN GOVERNANCE

Government's requirements on community consultation

Master plans, policy and administrative frameworks all call for consultation with the community and stakeholders, as an essential requirement in preparing and implementing business plans in the public and private sectors. This costs time and money early on but saves money in the long run.

In this case, information about the project plan was withheld from the community until February 2016 and that plan was lodged for ministerial approval without telling us, the other members of the WH steering committee, and perhaps also without informing Heritage Victoria.

We believe this is an issue requiring serious consideration. For example, as a consequence of no prior consultation, the new feature (café) will alter the external appearance of the building, built in 1879. This will take time to sort out and possibly extra expense to change the design. The release of draft versions of the project plan for public comment, say 6 months ago, would have avoided the situation we find ourselves in now. None of the activities listed in the project plan under Community Engagement addressed this fundamental need. At no stage did we feel meaningful

engagement was occurring nor were we able to participate in making good decisions that involved real choices and will stick. Moreover, despite our suggestion to advertise our small community meetings to the general public, the Museum opted not to expand involvement.

In summary; we are concerned about the lack of quality community and public consultation throughout the project process and more generally. The Museum's own description in the referral notice, 2.6, is at odds with our experiences. The applicant providing the particulars and evidence of the extent and inclusiveness of the community engagement as required in that section 2.6, can address these ambiguities. Perhaps these details are in another part of the notice documentation.

Inadequate governance

The substantial devaluing of this WH site in large part stems from the inadequate governance. The only WH management is vested in a steering committee with limited responsibilities, limited membership and over recent years, has not met.

This lack of external accountabilities is evident in the singular way this project has progressed, in the divergence from the original intent and in the lack of public consultation. It is further evident in the continuing languishing profile of the building that is best exemplified by its very restricted opening for the public: It is not open on weekends and public holidays or anytime there is a commercial event in the building.

CONCLUSION

From the community advocacy perspective, a priority of the grant was making the REB publicly accessible and a place of learning about the building's history; its world heritage citation, its national heritage registration, its social and civil roles over the years since 1880. The funding for public access and interpretation, was sought to address the concern the REB was not generally open to the public, its archival collection was stored away, with the building predominantly a commercial event venue that sublimates its historic values and curtails the heritage assets from achieving their potential.

WHO WE ARE

This submission is made by a coalition of community groups and residents from the areas adjacent to the world heritage site. Some individuals actually live and work within the world heritage environs; others live and work in the city of Melbourne. We all are very familiar with the Royal Exhibition Building (REB), its history and current uses and condition. We have been active advocates for improving public understanding and involvement in the world heritage. Where possible we have contributed to the WH planning and processes.

Especially, in regard to this project, we have been involved from its gestation. We maintain our firm commitment that the project will be a first huge step in protecting the building's future by revealing its story, its significance and beauty within the Carlton Gardens and surrounds, to the public well into the future.

SUMMARY OF OUR POSITION

Background to community involvement

Although the history of the funding of this project may not be relevant to the Minister in determining approval, we as a community, need to express that it is wholly and solely made possible by our community's lobbying Adam Bandt, the local federal member, for the REB's recognition and public access and for the funding. This project would otherwise not have been possible.

Through our local member's budget proposal in 2011, we secured \$20 million as a specific purpose allocation.

Outcomes in the budget allocation

The Federal Government's spending purpose for the \$20m was as a contribution towards the protection and promotion of the World Heritage listed Royal Exhibition Building in Melbourne. At the outset a mutually agreed outcome was tabled as 'proper recognition of the birthplace of the Australian Parliament' including:

- Acknowledgement of the Woiworung people – their struggle and survival
- Appropriate recognition of the site as the birthplace of the Australian Democracy with appropriate signage for and information provided to tourists
- Restoring the external walkway around the circumference of the Dome
- Establish an annual commemoration of the birth of the Australian Parliament
- A democracy education centre at the Royal Exhibition Building.

These outcomes are consistent with the federal governments areas of responsibility.

Support with stage 1 promotion elements

We support the project promotion elements that will improve public access to the dome and the dome walk. We offer comments later that the option of secondary public entrance reduces public's REB experience and impacts on the original design and fabric of the REB.

The new viewing deck and open circular shelter located on the deck are part of the stage 1 proposal. The deck, is above the REB's grand entrance. It overlooks the grand alley and Hochgertel fountain through to the city.

Support with reservation the conservation and repairs to the building.

We also support the conservation of the building's external fabric. We do though put a caveat on the extent to which the protection and preservation works should and will be funded from the \$20 million appropriated by the Gillard government for 2011-12. It is evident that by the nature of a heritage building and its commercial uses, the REB requires considerable care and attention. However, we object to some of the new and additional constructions proposed in the design to be built in phase 2.

Do not support the stage 2 works

We ask that the Minister not approve the design works for the new café and the covering of the pavilion.

Specific concerns in design

We object to stage 2 works, which include the café. As the café will be built in the area of the stage 1 public entrance, we have similar concerns about the impacts the substantial new structures will have on the original design and fabric of the REB.

We have strong reservation about the pavilion roof being visible from the ground level and its negative impact on very high profile and historically significant part of the building.

- It was the main entrance for the royal procession for the opening of Australia's the first parliament.

We question whether the southern promenade is the best location for public access. We prefer the public's REB experience be an inclusive visit into the REB to view the awe-inspiring dome interior and building, the history experience in the REB museum (not proposed) and the walk up to and around the dome. Simply, the aim should be for visitors to walk in the footsteps of those who shared in making the REB's story

Recommend additions for stage 1

We ask that the Minister require the interpretation area space be progressed as a priority in stage 1. Moreover, in this interpretation matter, we request a larger space in basement be designed for the museum and democracy education centre, to showcase the archives of the REB as befitting the status of our world and national heritage REB.

Funding shortfall and other funding sources

If there is no supplementary funding from the Victorian government, some of the 2/3 budget for the preservation works should be redirected to the REB interpretation and democracy museum. The Minister might consider it fair that the Victorian government be asked to source additional funding from other sources. The \$20 million budget allocation was described as a contribution. It certainly did not describe the use of 2/3 for preservation of external building, notwithstanding the need. It is eminently reasonable to expect that the Victorian government contribute, and that the Museum through its own budget, reallocate funds to the REB. Moreover, as is common practice, the Minister might advise that the Victorian government have the state government establish a sinking fund for the REB from income generated by commercial events and other income sources such as its reserve site car parking.

BACKGROUND TO COMMUNITY SUBMISSION: PUBLIC ACCOUNTABILITY

The Budget Papers state 'Funding for this measure will be administered by the Department of the Treasury, through the Federal Financial Relations Framework (hereinafter referred to as "the framework'). Under the framework, the States are subject to greater accountability, through

reporting arrangements including project agreements and implementation plans which will inform the Australian public on progress towards achieving the outcomes and the objectives of the agreement. Governments have committed to improving delivery, by ensuring accountability to the community, not just for expenditure, but more importantly, for the quality and efficiency of the delivery and the outcomes achieved.

Scrutiny of this plan and its underlying process, should focus upon whether it complies strictly with the original 'agreed outcome' and reflects genuine progress reporting to the Australian public and engagement of the community. The community representatives, who have been directly observing over the years since the funding, have serious concerns about the current direction of the project and the failure of its management to break away from the Australian culture of 'telling people what the planners have decided' (Grattan Institute).

Lack of governance

Associated with these concerns is the vacuum in WH governance that has characterised the custodianship of this world heritage site. A management steering committee was set up by amendments to the Victoria Heritage Act (1995). Its responsibilities were limited to overseeing of the planning documentation and since then, even the committee members would agree that it has been ineffectual. So without effective governance over the WH site, Museum Victoria has assumed sole responsibility for the development of this project.

This lack of external accountabilities is evident in the singular way this project has progressed, in the divergence from the original intent and in the lack of public consultation. It is further evident in the continuing languishing profile of the building that is best exemplified by its very restricted opening for the public: It is not open on weekends and public holidays or anytime there is a commercial event in the building.

USES AND HERITAGE VALUES

The Royal Exhibition Building should be Melbourne's, if not Australia's iconic building. Standing midst the Carlton Gardens and surrounded by a precinct of remaining Victorian era buildings. It should symbolise the story of Marvellous Melbourne. It should also herald the birthplace of Australia as a nation.

It is our view that this project compromises the world heritage values in specific ways. It should be the number one destination for the public and for tourists in Melbourne.

The current proposal falls short and in our view misses opportunities to set new directions for the building that better balances the commercial uses (loosely referencing the *palace of industry*) with the public access and education of the REB's history.

As a heritage site it is underachieving. As a commercial event venue it lacks most of the infrastructure and facilities taken as a given in contemporary purpose-build event venues. Its significance seems little appreciated by visitors even to the Museum or in tourist promotion. Most of the time the building is not open to visitors. The building is not even used for 100,000s of students visiting the Museum on their curriculum education programs. The most regular opening is weekday afternoons for one guided tour.

This project, will largely continue with the commercial event and function model rather than develop and showcase the REB's world heritage values.

We conclude, this to be the price paid for the focus on the REB as a commercial event venue. The price is compromising the public's REB experience and largely reducing it to a Dome experience. The price for visitors will be limited access into the extraordinary building to re-imagine the historic experience. The public's access through an external side entrance will avoid intruding on commercial hirings. But the high price paid by the building, by adding new structures to the

external southern walls and onto the grand entrance roof, is the unacceptable loss to the building's fabric and design integrity.

The project plan describes the principal promotion outcome as 'the Dome Experience' rather than 'the REB Experience'. Of all the towers of historic sites climbed by millions of visitors overseas, where else is there one that has access that is not an integral part of the main attraction? Moreover, most places effectively combine public access with normal business.

Then there are repeated references to the need to accommodate the Museum's 'independent exhibitions', that is the commercial events and functions. These events by and large serve no purpose in regard to educating people about the history of the birth of Australia's democracy, nor do they rate as state of the art representation of modern industry as during the industrial exhibitions for which the REB has WH citation. Take the HotRod and car Show, the bridal and other retail events. In fact, the plan seems intended to add the Dome Experience as a partner visitor attraction to the Museum's commercial display and retail program. And while the design of public access to and exit from the dome via the southern promenade, will not interfere with the running of the commercial events in the building, it will also deny the public access to the building interior to experience that magnificence and step into the presence of Australia's birth.

New structures have negative impact on heritage values.

The new public entry and exit Stage1 and the new café, Stage 2, to be built out from the REB southern wall and into the southern promenade. The South elevation drawings are of interest. Drawing No. A2.26 shows the proposed stage one new entry to the "Promenade Experience" to the west of the main south entrance portal. This is described as a conservatory style glazed box, taking up one bay of the existing west wing. Drawing No. A2.31 shows the proposed café extending across five bays all the way to the main south entrance portal, sharing the same basic design elements as the stage one glazed entry - featuring a 30 degree sloped glazed roof with an approximate max. height of 6.5meters above the existing ground level.

The proposed works to the south façade will be visible and will involve major change to the original fabric. The design treatment of the new entry and the café structures will need to address the heritage impact of the new addition with a less obtrusive solution.

We cannot blame the consultant who writes this plan if instructed in that way, but the embargo upon the Museum's design brief along with all other documents worthy of community participation, renders further community comment speculative. Irrespective, it is reasonable to ask 'has the funding been applied improperly to this duality of purpose?

The motivation driving Museum Victoria for this project is transparent. The injection of federal funds, is an opportunity of a lifetime to build its income stream from these improvements to REB that will generate recurrent revenue for 'core' business (running the Melbourne Museum, etc).

That the Museum has not sought until now to make capital improvements based on its Master Plan is indicative. Even in this project a number of important capital improvements that would seem to be a priority to enhance world heritage or even national heritage values, have not been initiated. Why not design these improvements as part of this project? Surely, a commitment to its own master plan, would demonstrate good faith and commitment to Museum's own long term planning program.

BACKGROUND TO PROJECT FUNDING DECISIONS

It is important to understand that, the WH REB and Carlton Gardens, do not receive an annual budget for WH specific capital or recurrent expenditure. All annual funding comes from the general budgets of each of the institutions responsible, Museum Victoria (amendments to the Museums Act 1996) for the REB and Museum reserve, and City of Melbourne for the Carlton Gardens. The WH site has over the years, received several small project specific grants from the federal government.

The \$20 million in the 2011-12 budget was a much-needed injection into Museum capital budget. The intention of the specific funding was to redress the poor public understanding of the significance and history of the REB and to improve public access. Since Museum Victoria moved to the site next to the REB in 2000, the priority has been on the REB to generate income as a commercial event venue. The regular commercial events have dominated the REB's uses and severely restricted public access and interpretation of the REB stories.

Since the 2011 budget allocation, Museum Victoria, has set its own priorities for the \$20 million and that is reflected in the description of the Protection and Promotion (PP) Project as submitted. On the one hand it is not surprising that the Museum has decided to put the majority of its \$20 million fund, by their estimate, two thirds of the total, into protection of the external building and the remaining third into the upgrade of the dome access. What is surprising is that the Museum seems not to have sought additional funding for the stage 2 of the PP project. Nor does the PP Project refer to those listed capital works in the REB Master Plan that relate directly to improvements in the southern promenade, where the new proposed project works are located. Neither it seems, is there a business plan for the REB that would be aimed at generating an income stream for funding other REB and reserve capital works or additional recurrent funding to maintain the building.

- There was no advice of any assessment having been done on the consequences to the REB's surrounding perimeter and even the Gardens, of these additions and their proposed uses. However,
- It would be assumed that there would be changes of substance from the commitment to new commercial directions and a reduction in the public access and Museum interpretation facilities.

COMMUNITY ENGAGEMENT - Lack of Interpretation and Communication plans for the site

We were surprised to learn from the application that there is a Communication Plan. Not one of us has heard of this over the past 5 years. The plan implies that the community would be fully informed and actively involved. There is nothing further from the truth as the purpose of the spasmodic community briefings was to 'tell the people what the planners have decided'.

The inclusion in the application of our group's, - the Friends of REB and Carlton Gardens, (FREBCG) - annual *World Heritage and Democracy celebration* event in May for local schools, is a aggrandizement of the reality, given our event plans were spoiled because priority was given on both occasions to commercial use of the REB. Regrettably, the community event proposed for this May 2016, was cancelled because the responsible museum management simply and unaccountably discontinued communication with us. Very belatedly we have a meeting, late this month, with the Director, Public Engagement to attempt reconnection.

The Museum's response to the section in the application confirms that the Museum recognises the need to be seen by others, specifically, the Minister, to be meeting the expectation to engage with

the community. The Minister might reasonably conclude that the community engagement requirement has been met. The Minister might also take at face value the expressions of commitment to a public communication plan. – The REB master plan includes such intentions. However, it is of considerable frustration that our experiences as local communities have not matched those as described. The Minister might care to ask the Museum for details of the extent and breadth of their community engagement and their REB public access program. More specifically the Minister might seek evidence of its public consultation over the past years of managing the PP project. It is news to us that the Museum has a documented Communication Program. However, we are pleased to learn of it.

Neither, to our knowledge is there a public Ministerial approved interpretation plan for the whole World Heritage site and environs area. Unaccountably, the Interpretation Plan that was to be one of the World Heritage plans, was not prepared. Neither to our knowledge has a REB and Reserve specific interpretation plan been approved. In our view, these gaps in planning to promote, inform and educate the public about the site, justify our concerns raised in this submission.

To our knowledge the Museum has not sought the general public's contribution as part of the PP project development. For example, the Museum has not sought views on the project from the 100,000s of Museum visitors or REB event attendees, nor posted project plans or designs in the REB the adjacent Museum or the Museum's other sites nor on the Museum's web pages.

Even for our local group, the occasional Museum meetings were of a general and preliminary nature and mostly confirmed ongoing delays in project time lines. The late February meeting referred to in the application and attended by a very small "by invitation" group, was the first time details and designs drawings were provided.

The late February meeting was the first time we learnt of the new cafe and pavilion structures and the new southern promenade public access, the funds' split and the lack of planning for the education centre. The meeting was an information session on a final project plan. We were not advised of the next steps and the imminent application to the federal Minister under the EPBC Act.

Hence this submission is the first opportunity we have really had to respond to the plans. We wish that it were otherwise.

We are locals, and predictably feel a particular responsibility to the advocacy of the world heritage REB, the Carlton Gardens and the environs area. All things being equal, we still aspire as a community, and in the future, with the mass of the public, to share in the custodianship of these places and to have pride in the heritage values of our only Victorian world heritage site.

Thanking you,

CORBA-Melbourne (Coalition of Resident & Business associations)

FREBCG (Friends of the Royal Exhibition Building & Carlton Gardens)

FRA (Fitzroy Residents' Association)

Cr. Jackie Watts, Knowledge Portfolio, City of Melbourne, and Ambassador, FREBCG.

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