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National Trust File no.: G13009 *Royal Botanic Gardens, Melbourne*

Re: Melbourne Gardens Master Plan 2019-2039

Dear Professor Entwisle,

Thank you for the opportunity to provide feedback on the *Melbourne Gardens Draft Masterplan 2019-39*. The National Trust congratulates the Royal Botanic Gardens on the development of this robust and forward-thinking masterplan. We acknowledge that the masterplan will provide a blueprint for the Gardens as it evolves over the next 20 years, responding to climate change, increased recognition of Aboriginal cultural values, care for the State Botanic Collection, the construction of the ANZAC train station, and the evolving role the Gardens play in the broader life and health of the city.

While we support the draft masterplan in broad terms, we do have some concerns outlined below that we request are considered by Royal Botanic Gardens Victoria (RBGV) and incorporated into the final draft of the masterplan document.

1. National Trust Heritage Register

The National Trust of Australia (Victoria) (National Trust) is the state's largest community-based heritage advocacy organisation actively working towards conserving protecting our heritage for future generations to enjoy, representing approximately 16,000 members across Victoria. As Victoria's premier heritage and conservation organisation, the National Trust has an interest in ensuring that a wide range of natural, cultural, social and Indigenous heritage values are protected and respected, contributing to strong, vibrant and prosperous communities.

The National Trust maintains a Heritage Register of Significant Places, including buildings, landscapes, gardens, trees, and public art. The *Royal Botanic Gardens, Melbourne* was added to the National Trust Heritage Register in October 1978 (file no. G13009). This classification was revised in June 1994 to amend the extent of registration and update the heritage status of the site to 'International' significance. The Gardener's Cottage (also known as the 'Plant Craft Cottage') located on Birdwood Avenue was added to the Heritage Register prior to the full registration of the gardens in March 1974, identified for its significance at the state level (file no. B3430). In order to update our records, we request that the Conservation Management

Plan (CMP) prepared in 2018, or a summary of the Plan, be made available to our organisation for inclusion in our Register archive, and ideally to the public.

The National Trust also maintains a Significant Tree Register, including approximately 2,500 significant tree records compiled over 30 years. Within the Melbourne Gardens there are currently 36 significant trees included on the Significant Tree Register. A list of these trees, including locations and relevant historical and scientific information, has been included at Appendix 1. We currently have an open enquiry with Royal Botanic Gardens Victoria (RBGV) staff to get a status update regarding the current condition of these trees, and request to be notified of any potential impacts as they relate to these significant trees.

We also have an interest in the condition of a Gallipoli Oak tree that was planted within the Melbourne Gardens in 2013 to mark the commencement of the National Trust Gallipoli Oaks Project. We request that the National Trust be consulted if any actions regarding this tree are considered in the future (such as relocation for example).

2. Land Manager Consultation

As outlined on p11 of the draft masterplan (full text draft), we note that the final draft document will consider the Gardens interface with neighbouring land managers to 'expand and improve the presence of the Gardens beyond the historic fence line'. As the custodians of La Trobe's Cottage, a heritage property located within close proximity to the Gardens and the development of the Nature and Science Precinct, the National Trust would expect to be consulted regarding this interface and the development of a land manager's plan. It should also be noted that the National Trust currently offers guided walking tours of La Trobe's Cottage and Government House that traverse within close proximity of the Gardens precinct.

3. Tree Canopy, Removal and Replacement

As a general comment regarding the masterplan document in broad terms, we submit that a target for tree canopy cover for the entire site should be developed which sets a benchmark below which canopy cover should not fall. While we support the comments in the plan about the difficulties associated with tree planting, especially in lawn, we submit that there should be an increase in both tree numbers and species diversity. We further submit that there should be a reference to the Royal Botanic Gardens Tree Replacement Strategy document included in the masterplan which is used to inform its action in relation to tree removal and replacement.

4. Climate Change

It is pleasing to see many references to climate change in the masterplan as it affects the Gardens. While we support the general thrust of the masterplan on this aspect, we do have some further thoughts to strengthen this response.

The comment in regard to meticulous record keeping is of vital importance and should include detailed information on trees that might decline, have reduced growth or die under a new climate change. It is important that we know what fails and what works and does not work.

In consultation with our Significant Tree Expert Committee, we submit that second guessing the effects of climate change is biologically and ecologically fraught and so we suggest that the gardens continue to plant cooler climate trees as part of a broad range of species plantings and not just those from warmer drier situations that seems to be suggested by the masterplan.

Further, we do not believe it is clear whether any trees are likely to be removed in the course of implementing this plan. While we acknowledge that the Gardens would handle such removals, if any, sensitively, we believe this should be made clear from the outset.

5. Aboriginal Cultural Heritage

We are pleased to see a deep commitment within the draft masterplan towards preserving and celebrating the Aboriginal cultural heritage of the precinct, specifically through increased recognition of Traditional Owners, their values and their connection to Country (summary document p5). We are pleased to see that an Aboriginal Heritage Values document was commissioned by the Gardens in 2017, developed in consultation with Traditional custodians, which identifies these associations and paints 'a strong picture of a living landscape with ongoing connections to Country for the Woi wurrung and Boon wurrung people'. We further request a copy of this document, or a summarised version, for inclusion within our Register archive.

We commend the Gardens for their proactive work within this space, and suggest the development of a Reconciliation Act Plan and establishment of an Aboriginal Advisory Committee to further assist in the implementation of these commitments over the next 20 years. The National Trust would be please to provide guidance regarding this in consultation with our own Aboriginal Advisory Expert Committee, and based on our experiences with the Reconciliation Action Plan process.

6. Melbourne Observatory

We submit that the highest impact on character and cultural heritage within the masterplan are the proposals for the Observatory landscape. While the place is managed by the Gardens Board, we submit that it has a different history and landscape character that should be clearly reflected in the masterplan.

The National Trust supports the proposal within the draft masterplan to remove the existing car park and roadways adjacent to the Melbourne Observatory, and submit that the landscaping proposed for this location should be informed by the CMP.

As outlined in the text report (p46), it is proposed that the character of the Observatory is to be restored, with 'contemporary interpretation of historic mass and void combined with a utilitarian path system'. We question whether this consideration has been addressed in the CMP and whether the proposed character reflects the historic character of the place. We further question whether the garden beds would be more appropriate than open space, and whether the character zone reflects and interprets the historic boundary of the Observatory.

We note that the restoration of the Observatory character would not imply a 'contemporary interpretation of the historic Guilfoyle style', as specified in the masterplan. We submit that

this treed landscape was mostly the work of Mueller (p22-23) and the proposed Masterplan layout is highly intrusive and has questionable historic basis.

Also of major concern is the expansion of the Children's Garden into the Observatory landscape, which we do not support.

We further reinforce that the character differences between Melbourne Gardens and the Melbourne Observatory landscapes should be clearly articulated. We question the removal of the dividing fence (p80), particularly its significance as a historic boundary and whether it should be retained or interpreted to demarcate the character of the Observatory. We note that the masterplan identifies the character of the Observatory grounds as an open landscape with low island plantings which reads as an extension of Domain Parklands – we further question whether this is based on historic values and evidence.

We submit that the Observatory fence should be retained and reinstated to protect a place of National significance and assist in an understanding of the significance of the place. Importantly, it would help define its own space, and separate the Observatory landscape from the surrounding Domain Parklands and Birdwood Avenue. We believe that to suggest that the Observatory landscape will read as an 'extension of the Domain Parklands' misrepresents the heritage significance of the Observatory and should not be pursued.

We submit that the principles of assessing activities based on support for values of the Gardens and impact on the landscape is a helpful inclusion within the draft masterplan, including the development of the matrix diagram (p59). Within this diagram we note that the Observatory is highlighted as the most sensitive area within the Gardens precinct. We question whether the proposed use as an event space for up to 5,000 people is an appropriate use for this space, and in particular what infrastructure would be required to facilitate this use and whether the potential impacts been adequately assessed. We query what the 'purpose built screened tenant storage' (p49) would look like, which we assume is to service the proposed event space, and what impacts this may have on this area of high sensitivity.

We suggest that the masterplan should include a requirement to develop a lighting policy which considers relevant lighting standards for observatories, and addresses the provision of temporary lighting for events to minimise impacts on the Observatory.

As noted on p49, we note that the use of the observatory buildings is 'to be determined'. We submit that this consideration should be subject to further stakeholder consultation.

Overall, we submit that further detail should be provided to guide the proposed future works at the Observatory and to provide certainty about future uses and priorities. We suggest that this should be developed in line with the CMP and be informed by further stakeholder consultation. We question whether an additional plan should be developed following the masterplan process to ensure that this issue is adequately addressed. We further suggest that a timeframe could be established to guide this.

In terms of governance, it could be helpful to look at opportunities for a representative of the Melbourne Observatory at Board level, particularly to represent the interests of the

Melbourne Observatory and to improve engagement with the Astronomical Society of Victoria as the masterplan is finalised and implemented.

7. Conservation Management Plan

While we applaud the initiative taken by the RBGV to commission and prepare an updated Conservation Management Plan (CMP) in 2018, we are disappointed that this document was not provided for public review, to allow a robust assessment of the masterplan against the relevant policies in the CMP. We believe our concerns regarding the Melbourne Observatory precinct in particular would have been more adequately addressed had we had the opportunity to consult the CMP. We question, for example, whether the CMP would support the removal of G Gate and fence, the proposed realignment of A & F Gate, and the relocation of the iron arbours and seats.

The CMP undoubtedly provides actions to preserve the heritage fabric of the Gardens, while allowing for change, recognising that 'the continual evolution of this landscape is accepted, and expected to continue over time' (p16). As such, we believe that it is important that the policies and actions identified by the CMP be reflected in the masterplan recommendations. This being considered, without access to the CMP, we are unable to comment on this.

Conclusion

Thank you for the opportunity to provide feedback regarding the *Melbourne Gardens Draft Masterplan 2019-39*. We reiterate our support for the masterplan and its commitment to Reconciliation, yet suggest further review based on our concerns outlined above. In broad terms, we suggest a process of periodical review is specified in the masterplan as circumstances change, and that timeframes be provided in the final document. Please get in touch with this office on 9656 9837 if you have any further questions or concern regarding our submission.

Yours faithfully,



Felicity Watson
Advocacy Manager