

16 October 2019



6 Parliament Place
East Melbourne
VIC 3002

Mr Bruno Benavente
Strategic Initiatives Coordinator
Parks Victoria

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Re: Revitalising Tower Hill State Game Reserve

Dear Mr Benavente,

Thank you for the opportunity to respond to the proposed Tower Hill Activation and Linkages Business Case, which seeks to revitalise Tower Hill State Game Reserve and cater to an expected increase in visitation to the region.

The National Trust of Australia (Victoria) (National Trust) is the state's largest community-based heritage advocacy organisation actively working towards conserving and protecting our heritage for future generations to enjoy, representing approximately 26,000 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 supports Parks Victoria's intention to protect Tower Hill's cultural significance, while exploring new options to revitalise it to an international standard wildlife reserve with integrated visitor facilities. Tower Hill State Game Reserve is a cultural landscape of historical significance, reflecting more than a century of changing attitudes to landscape in its evolving status and the character of its environment. Its aesthetic, historic, scientific, social and architectural significance to the State of Victoria is reflected by its inclusion in the Victorian Heritage Register (VHR). Of particular interest to the National Trust is the architectural significance of the Natural History Centre (now known as the Worn Gundidj Visitor Centre), designed by Robin Boyd in 1962 and completed in 1969.

Our key comments relate to the absence of a Conservation Management Plan (CMP) for Tower Hill. The National Trust believes a CMP is essential to the management of the heritage values of a place, by developing policies that guide the conservation of historically significant sites. We have concerns that going ahead with the creation of Business Case without a CMP in place risks significant negative impact on the cultural landscape of Tower Hill and could pose a threat to optimal conservation of this unique place.

We recommend that Parks Victoria develop an overarching statement of conservation intent, with sub-policies related to changes, future use, development, management, conservation, and maintenance. The CMP will be able to effectively guide the Business Case, providing an opportunity to discuss management issues, constraints and opportunities that may affect Tower Hill, including: constraints and opportunities arising from the significance of the place; statutory constraints; management issues; economic considerations such as resourcing; stakeholder views; condition issues; and future conservation works.

The National Trust supports the balancing of heritage conservation outcomes with the need to make culturally significant places more accessible and engaging for visitors. As part of the design process, the upgrades to visitor facilities and experience opportunities should be carefully assessed against identified heritage values and the policies outlined in the CMP. As plans progress, we recommend that Parks Victoria liaises closely with Heritage Victoria and engages an independent heritage consultant to guide the design process in relation to changes to the visitors centre, and ensure that Park Victoria's aspirations for the upgrade can be balanced with effective conservation of Tower Hill.

In conclusion, while we support Parks Victoria's aspiration to provide high-standard visitor experiences at Tower Hill State Game Reserve, this must be balanced with need to protect and enhance the cultural landscape. We particularly have concerns regarding the creation of Business Case that is not informed by a CMP. We recommend Parks Victoria develop a Tower Hill State Game Reserve CMP as a matter of urgency, and make this plan publicly available.

The National Trust commends Parks Victoria for progressing this work, and we look forward to providing further feedback on the Business Case as it progresses. Should you have any questions regarding the above, please contact Eloise Dowd, Environmental Heritage Advocate, on 9656 9823, or at eloise.dowd@nattrust.com.au.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'F Watson', with a long horizontal flourish extending to the right.

Felicity Watson
Advocacy Manager
National Trust of Australia (Victoria)