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SUBMISSION - ROYAL PARK MASTER PLAN REFRESH

Introduction

The Friends of Royal Park, Parkville has as its main aims:

- ^o To protect and enhance the landscape character of Royal Park and its predominantly indigenous vegetation associations of open woodland, grassland and pockets of wetland.
- To protect and enhance biodiversity, habitat and indigenous flora and fauna in Royal Park
- To provide learning activities and experiences to participants that contribute to improving the natural environment of Royal Park

These aims can be applied in a wider context, when considering the themes put forward for discussion as part of the refresh of the 1997 Royal Park Master Plan. These themes are:

- ° Celebrating Aboriginal Culture and knowledge
- ° Caring for nature
- ° Continuing the legacy of previous Royal Park master plans
- ° Landscape characters
- ° Recreation and community wellbeing
- ° Visitor experience
- ° Movement through and within the park
- ° Parking, roads and transport

We provide input into this Royal Park Master Plan review to uphold the aims of the Friends of Royal Park, Parkville in the future development and management of Royal Park.

Theme 1 – Celebrating Aboriginal culture and knowledge

It is a very great shame that much of the Traditional Owner / Wurundjeri Woi Wurrung direct knowledge about the Royal Park area has been lost in time / since European

settlement. And shameful too that proper recognition of Aboriginal culture and connection to Country, generally and specifically in regard to Royal Park, has taken so long.

A key aim of the of the Royal Park Master Plan Refresh will be to identify, appreciate and apply Traditional Owner cultural heritage values.

The Friends of Royal Park thus supports the recognition and celebration of the Wurundjeri Woi Wurrung heritage culture in Royal Park – and particularly in regard to landscapes, flora, fauna and cultural practices.

For the refreshed Master Plan to achieve these aims, it is important it should be wellinformed by engagement with the Wurundjeri Woi Wurrung as well as other sources and experts – given the loss of earlier direct knowledge. For example, information could be sought from reports of early European settlers, e.g. Robert Hoddle and A.W. Howitt, the latter known for his extensive interaction with Traditional Owners; Albert Mattingley, Sanderson, Georgiana McCrae, early painters Beth Gott's work on Traditional Owner association with plants could be another source, then there is Bill Gammage's book. Professor Stephen Morey, La Trobe University researches the Aboriginal languages of Victoria, interpreting 19th century publications and manuscript sources. Professor Ian Clark, Federation University has written extensively on Victorian Aboriginal history.

Though understandably limited, archaeological information could indicate cultural practices and land uses. For example, shells have been found on the escarpment in the Royal Park West Remnant Vegetation site, indicating existence of shell middens ... shells sourced from nearby 'Monee Monee' chain of ponds?



Abalone (Royal Park) – Museum Vic



? Mollusc collected circa 1960s

A stone tool was found in the same RPW Remnant site in 2012; relevant authorities were notified; it is not known where this artefact now is:



Just recently, stone flakes have apparently been found around the Royal Park Main Drain area and an Aboriginal Heritage permit is now required for the site.

An important issue in regard to Royal Park is a name recorded by A.W. Howitt 'Quor-nóng' in his 1897-1901 notes, see: <u>https://theconversation.com/rediscovered-the-aboriginal-names-for-ten-melbourne-suburbs-99139</u>)

Regar David - quer-nong

and also separately in other Howitt papers as 'Quirnong'.

Whether these names refer to a landscape feature/landmark or culturally important site needs to be determined. Detailed correspondence by FoRP member, Kaye Oddie, with Professor Ian Clark, Federation University and Professor Stephen Morey from La Trobe University has been undertaken, and a presentation by researcher, Andrew Tanner, suggests possible meanings could be 'brook/creek' or 'rising ground'. The spelling(s), however, do not conform to any reasonable orthography.

The FoRP would support a dual naming of Royal Park with a confirmed historical Wurundjeri name alongside its official English name but only after expert research and extensive consultation to determine the appropriateness of the Wurundjeri name, its likely meaning and the correct spelling applied. The FoRP would like to continue to be part of the naming consultative process, whether through the Master Plan Refresh or as a separate matter.

A draft Cultural Heritage Management Plan ('Royal Park, Parkville - Background History – Conservation Management Plan' (Context, June 2021)) was prepared as part of the Royal Park Master Plan review process. The FoRP does not accept the unquestioned citing of 'Quor-nóng' as the name for Royal Park in the draft report and calls for this to be corrected in the final report.

In addition to the above naming issue for Royal Park, the FoRP does not accept the random naming of features in the Park, without more informed consideration, research and consultation, so that repeats of 'Trin Warren Tam-boore' do not occur.

In recognising Aboriginal culture and knowledge in re-creating landscapes, flora and fauna practices and management in Royal Park as part of the Master Plan Refresh, reference should be made to Bill Gammage's book "The Biggest Estate on Earth: How Aborigines made Australia" (2011) and other relevant studies and reports (e.g. 'Pre-colonial plant list for the City of Melbourne' by Sinclair, Sutter, Duncan May2021).

Theme 2 – Caring for nature

What are the current issues?

Page 9 of the Discussion Paper states: *Each theme section includes a background...*, however the Caring for nature 'background' in the document is the situation at 2023. This 'background' fails to acknowledge the large amount of work undertaken in enhancing biodiversity and habitat in the Park since the 1980s. It does not acknowledge the many landscape plans and vegetation plans/projects undertaken to restore Royal Park's open grassy woodland/EVC plantings by Australian Landscape Management, CoM's Mary Chapman's extensive work, early recognition of the Royal Park West Remnant Vegetation Site by the Friends of Royal Park West and their proactive work with the Council, many flora

and fauna surveys, including the Friends of Royal Park's long-running bird surveys ... all "caring for nature".

And it does not acknowledge the informative booklets and reports the City of Melbourne collaboratively produced that are relevant to Royal Park, e.g.

- The Little Things that Run the City: How do Melbourne's green spaces support insect biodiversity and ecosystem health? by Mata et al (2015)
- Our City's Little Gems Butterfly diversity and flower-butterfly interactions in the City of Melbourne by Kirk et al (2017)
- Pre-colonial Plant List for the City of Melbourne by Sinclair et al (2021)

It is **this** background that has enabled the more recent university and other ecological research projects to be undertaken and sets the scene for future approaches. The Master Plan Refresh must provide such background information (for this Theme and others) so that recommendations in the refreshed Master Plan can be understood in context.

A significant issue that has not been addressed in the Discussion Paper is the planted landscape of Royal Park. The Park is characterised predominantly as 'open grassy woodland', appreciated and enjoyed as a bushland park in the middle of the City.

But 'open grassy woodland' has a scientific basis; it is called Environmental Vegetation Class (EVC) no.175 and this describes the type of plant communities in the Park – important descriptors of pre-colonial vegetation and for the planting programs that have been undertaken since the 1980s. EVC 175 classification also is an indicator for the biodiversity and habitat of the Park.

The 1997 Master Plan devoted a significant section to this topic 'Landscape Character & Plantings' and listed six key objectives. So, too should the Master Plan Refresh and similarly set out strategic and specific directions for the ongoing planting programs and maintenance regimes.

Master Plan Refresh to consider

... amended as highlighted and with one specific issue elaborated on in 'We want your thoughts':

- Defining ambitious but realistic goals for protecting and enhancing biodiversity in the park (comment: not just 'increasing')
- Identifying which ecological systems are being threatened, how they are being threatened, and possible responses to the threat/s (comment: 'systems' better reflects the issues than non-definitive 'values'.)
- Supporting ongoing research, including citizen science, and other projects to protect and enhance biodiversity and habitat in Royal Park (comment: it is important that the wider public/interested groups are involved, not just high level 'university' research.
- Prioritising best practice nighttime lighting and control of noise and air emissions for wildlife principles, encouraging Royal Park's role as part of a wider open space wildlife network.
 (comment: research shows that noise and air emissions (e.g. ambient city noise, vehicle emissions) can detrimentally impact wildlife behaviour in urban settings.)

We want your thoughts

If biodiversity and habitat are to be protected and enhanced in the Park, identifying ecological <u>threats</u> is rightly a key aim.

Royal Park does have a current and increasing threat in the form of the dominance of one type of vegetation - the shrub Rhagodia. This shrub, believed to have been introduced as a kind of weed control in shrub beds, is now extensive throughout the Park; dominating many shrub beds and wider areas as inspection would show. So much so, one could rename Royal Park 'Rhagodia Park'! Rhagodia shrubbery has overwhelmed the previous variety of other indigenous species, particularly other shrubs and lower-growing plants, causing their loss and creating a planted and visual monoculture. We do not believe the dominating Rhagodia shrubbery throughout the Park meets the criteria of open grassy woodland or its EVC 175 plant associations and proportions. The Park's open vistas are becoming closed vistas due to the extent and spread of this rampant shrub – changing the very nature of the Park as open grassy woodland – the key characteristic of Royal Park. Early settler reports cited gum, wattle, she-oak and grasses in a park-like setting ... extensive shrubbery was not in their descriptions. Worse is that in killing off the many of the variety of indigenous species originally planted in the shrub beds of the Park, there is loss of biodiversity in plant species, in turn detrimentally impacting on habitat provision. The Master Plan Refresh must address this unacceptable threat to Royal Park's identified open grassy woodland landscape character, EVC's plant species and ecological associations, including biodiversity and habitat and must re-establish these parameters and principles.

Another 'threat' more difficult to address in regard to biodiversity is Noisy Miners. The landscape of Royal Park is attractive to this species with many open sports fields and surrounding trees to the increasing detriment of the numbers of small bird species. It seems the good work being undertaken in revegetation to enhance habitat is being thwarted by the overdominance of Noisy Miners. Could a project be initiated with expert organisations to try to address this?

A threat to the ecological well-being of Royal Park is lighting. Royal Park is designated a 'dark park'. Inappropriate, excessive, obtrusive lighting is not in keeping with protecting and enhancing biodiversity and habitat for wildlife in the Park. More detailed comment on the issue of lighting in Royal Park will be made under Theme 7.

For the future, 'Caring for nature' in Royal Park should emphasise communicating its environmental/ecological attributes to the wider public, especially younger age groups. Recommended would be community and school environmental activities introducing young people to nature and appreciation of the environment. Community plantings were once (yearly) events in Royal Park, well-attended by families with children. Park Rangers' on-going holiday programs for children are much sought after.

The Royal Park Master Plan Refresh should consider applying these recommendations to this Theme as well as in Theme 5 - Recreation and community wellbeing and Theme 6 - Visitor experience.

- The FoRP would support more renaturing (rewilding) in the Park where feasible. This would be in keeping with the several aims under 'Master Plan to consider'.
- Recommendation for use of substitute, more eco-friendly measures in controlling weeds and pests in the Park. Use of pesticides in the maintenance of grassed sports fields is known to compromise insects whose life cycles involve underground stages. Mulch similarly detrimentally impacts ground-dwelling insects and other invertebrates, seen as beneficial in enhancing biodiversity. Mulch is widely used in the Park for preparatory and maintenance of plantings.

Is the relatively extensive use of glyphosate (or other herbicides) for weed control detrimentally affecting the important soil mycorrhizae – key components for biodiversity and habitat?

It is hoped that these issues can be built into a strategic direction or recommendation(s) in the new Master Plan.

Theme 3 - Continuing the legacy of previous Royal Park master plans

Background

 Why isn't reference made to the 1977 Royal Park Landscape Masterplan (Melbourne City Council Parks, Gardens & Recreation Department) as it shows the Council was advanced in its thinking in recognising and developing an open space and recreational plan for Royal Park and involving the community in its preparation? This was <u>seven</u> years before the 1984 masterplan was prepared. We believe it is important that the Council's advanced thinking at the time should be recognised.

The Friends of Royal Park support continuing the principles of the 1997 Royal Park Master Plan – particularly the key objective:

 Evoke the original Australian landscape character of land and space, using the important qualities of the Park that are already present. This is to be done principally by an editing or clarification of the landscape, rather than by further development or addition of new features.

We support the objective:

 Encourage greater use and enjoyment of the Park through balanced provision for different types of recreational activities, ranging from organised involvement in physical sports through to casual, spontaneous and individual uses of public open space ... but with qualification.

There is an increasing imbalance between the types of recreational uses with organised physical sports (40% of the Park) and intensification thereof threatening the environmental values and the amenity enjoyed by passive recreational use of the Park.

Access to open space and nature are key factors in the health of a community. Increasing population of Melbourne will mean provision of these factors will have to take on greater importance in open space planning for the future in Royal Park. [Indeed, this Discussion Paper recognises this under Theme 2 – Caring for nature.] So a line has to be drawn in regard to the next objective from the 1997 Master Plan:

- Provide a complementary context for major attractions within the Park, including the Royal Melbourne Zoo and sports facilities of state or metropolitan significance.

The Zoo conducts activities and events outside its major role as a zoological gardens – with musical entertainment and other non-zoological nighttime events. The redeveloped, expanded Melbourne Sports Centre Parkville (formerly State Netball & Hockey Centre) has seen significant intensification of its use within the Park setting.

It has to be asked, when do the increased activities of the two major centres and the intensification of use of the many dedicated sports facilities cease to be 'complementary' to the Park? When do their cumulative impacts become detrimental to the other values of Royal Park as a natural 'bushland' park in the City, its landscape values and amenity, its biodiversity and habitat values, its role in providing passive recreational access to and enjoyment of open space and nature for an increasing population? The Master Plan Refresh must address this imbalance.

Royal Park is a destination in its own right; it does not have to cater for or "complement" Zoo, sport and other major attractions. We suggest that the 1997 objective be deleted.

We support continuation of the four landscape images set out in the 1997 Master Plan, that are inherent in the landscape character of Royal Park and which direct the physical intent of design proposals:

- Landform and horizon
- Sky and wind
- Expansive grassland
- Tree form and silhouette

Master Plan Refresh to consider:

- Addressing the imbalance issues referred to in the comments made above.
- Crossing the railway in one or more additional locations to physically unite the separated areas of the park. No crossings should be made or recommended until feasibility studies have been undertaken determining need, location, departure/destination points, numbers of users, times of day/week etc. This is also important because of CoM ill-informed call for the LXRP elevated structure through the Park should be designed higher without any data supporting a crossing underneath it. The proposed upgraded Royal Park Station/tram crossing/Poplar Rd intersection must be considered the major crossing point for the two sides of the Park.
- Consolidating car parking areas in the park. It is not only 'consolidating' car parking, it must also be 'rationalising' the amount of car parking in the Park. This will allow for the reduction of car parking in the Park and for encouragement of public transport use to access the Park. In considering 'rationalising' car parking, the types of car park must be considered: opposed is further hard surface parking areas; opposed is 'overflow' car parking on parkland where grass is supposedly is maintained with special subsurface structures. The failures of the 'overflow' car parking areas around the Zoo and the Melbourne Sports Centre, Parkville show that the grassed parkland is destroyed. In 'rationalising' car parking, car parking lighting must be addressed in keeping with the landscape/biodiversity & habitat/dark park parameters for the Park.

Some of the above comments are also applicable when considering the following points from the Discussion Paper:

- Actions relating to access, circulation and parking, including the consolidation of car parking areas and the realignment of the Brens Pavilion vehicle entry from Macarthur Road to The Avenue.
- "Sports facility upgrades, including reviewing the location of the golf club pavilion." Further
 upgrades to sports facilities are opposed with all dedicated sports facilities having recently
 been upgraded or approved for upgrading, excepting Ross Straw Pavilion. It is questioned
 what further upgrades are being considered? It could mean intensification of use, days,
 times, lighting, noise, and other impacts (e.g. degradation of grassed sports fields) to the
 detriment of the other Park parameters, not to mention alienation of parkland itself for
 associated sports functions and infrastructure (e.g. more practice cricket nets) or conversion
 of grassland to synthetic playing surfaces.

The FoRP considers it critical that Royal Park's open space and amenity is protected and that alternative sites are sought elsewhere for future sports facilities, rather than upgrades to existing facilities in the Park.

We want your thoughts

What do you believe have been the three most successful projects within Royal Park in the past?

- Recognition of Royal Park's pre-European landscape character of open grassy woodland and implementation of planting programs to achieve this. Expanding on this recognition of the importance of ecology in the plantings in the Park, that is, establishing upper-storey trees, mid-storey shrubs, lower storey forbs and ground covers and grasses, thereby providing and promoting biodiversity and habitat in the Park.
- Trin Warren Tam-boore Wetlands as it reintroduces the former main water course of the Park, albeit in different format and attracts and provides habitat for birds and other fauna.
- Renaturing (rewilding) projects that have more recently been undertaken in the Park: the reintroduction of Matchstick Grasshoppers and rehabilitation of the White's Skink Habitat Site. These projects represent a collaborative approach to the Park between council, research organisations, the Zoo, park management and Friends and other interested community groups.

Theme 4 - Landscape character

The FoRP reiterates its support of the four images for Royal Park in the 1984 and 1997 Master Plans:

- Landform and horizon
- Sky and wind
- Expansive grassland
- Tree form and silhouette

We do not believe the contemporary interpretation photographs of these images in Fig 3 of the Discussion Paper properly represent the four images or the overall, wider landscape character of the Park. They represent much narrower interpretations of the images. When in the Park, one can experience several of the images at the same time/place and that is the

joy of Royal Park. Please don't restrict that wider interpretation. Photographs may not be necessary at all.

What are the current issues?

The statements that water bodies: Trin Warren Tam-boore and the Billabong (or the Australian Native Garden pond) do not accord with the four landscape images of Royal Park is erroneous.

The definition of 'landform' is 'a natural feature of the Earth's surface''. A simple check of dictionaries or online Wikipedia shows water bodies, such as lakes and rivers are types of landforms. So Royal Park's wetlands, creeks, swales, ponds <u>are</u> included in the first image: 'Landform and horizon'.

If one is going to be pedantic, then the image 'Tree form and silhouette' is deficient in that it does not represent the other plant types that comprise the Park landscape. We believe that 'tree form' can be interpreted in keeping with Royal Park's "open grassy woodland'. Trees are part of the EVC for open grassy woodland, as are the mid-storey, lower-storey, ground cover plants.

The Royal Park Master Plan Refresh could expand on the four simple, evocative images with text underneath stating:

It should be noted that 'Landforms' include water bodies in the Park: the creeks, ponds, swales, wetlands and that 'Tree form' taken in the wider context of the Park's 'open grassy woodland' landscape character includes the other types of vegetation in the Park: the shrubs, and lower storey plants.

or

the artist who drew the original sketches could be asked to draw additional sketches for each image, so that 'Landform and horizon' could have a second illustrative sketch of the billabong or the creek; 'Tree form and silhouette'' could have a second sketch of open woodland/shrub setting?

Master Plan Refresh to consider

In keeping with our comments above, we do not feel the four images are separate and need connecting by some kind of 'treatment'. As stated above, when in the Park, one can experience several of the images at the same time/place and that is the joy of Royal Park. The joy too is being able to be drawn informally drawn from one to another, i.e. not necessarily following some structured connection. Perhaps what would be better meant by connecting and treatments would be better signage directing to different parts or features of the Park.

<u>What if</u>:

Adding a fifth, water image is not supported for reasons given above.

We want your thoughts

• How strongly do you support that waterbodies or waterways will become more distinctive over time as a new landscape character?

Early maps of the Park (e.g. MMBW 1895 map of Royal Park) show the main creek (Royal Park Main Drain) and what could be creeklines or gullies, which in the future could be reinstated, but these actions should be supported by historical and geomorphological research. The existing landscape character of Royal Park should be respected and further contrived waterbodies should not be installed.

What is supported is to expand the main RP creek (Royal Park Main Drain) corridor by land acquisition from former CSL +/- Orygen and to complete the revegetation of the main creek and its tributary creek.

Theme 5 – Recreation and community wellbeing

Background

Paragraph 1 – Why should the benefits of Royal Park be physical (activities)? Beneficial mental health and wellbeing can also be catered for by open spaces and nature.

Paragraph 2 - photographing nature is another popular informal recreational activity.

Paragraph 4 – Royal Park also has a cultural heritage as a venue for passive recreation activities as early photographs showed of picnicking, walking, painting ...

Paragraph 5 – Large areas dedicated to sporting activities must be put into context. The extended use of Royal Park for army purposes rendered it without significant vegetation and subsequent opportunist conversion to many sports fields post WWII. The current large amount space in Royal Park used for dedicated sports ... and the loss of several sports fields must be read in this context and in keeping with the subsequent 1984 and 1997 Master Plans objectives to recognise its early landscape character.

Master Plan Refresh to consider

• Increasing the capacity of existing sports fields so that Royal Park can continue to support participation in community sport and recreation

The FoRP is strongly opposed to this because it will lead increasingly to the detriment of the Royal Park's <u>parkland</u> values, its amenity, its biodiversity and habitat values; and effective alienation of parkland for the wider community.

Increasing the capacity of existing sports fields will lead to:

intensification of use: all days of the week and nighttimes; expanded facilities – pavilion extensions, size, associated structures such as more cricket practice nets, storage facilities, outdoor entertainment areas; longer and more intensive floodlighting of ovals; longer lighting periods for pavilion and carparking areas; call for more car parking/overflow parking on parkland/increased use of car parks in association with other park sports facilities/Zoo/Melbourne Sports Centre; increased sports field maintenance (increased pesticide and herbicide use); more rubbish; more wear and tear on the surrounding parkland; more major events exacerbating all of the above.....

With over 40% of Royal Park being dedicated for organised sporting facilities, the Master Plan must call for any expansion of current sports functions in Royal Park to be <u>off-site</u>. If Softball could build a dedicated facility away from Royal Park, then so too should the University of Melbourne and other sports organisations for expansion of their activities.

• Supporting longer stays in the park, especially around play and other gathering spaces, to increase opportunities for social connection

It is not understood what is meant by this point. Does it mean building more playgrounds, more BBQs, toilets, more seating and lighting of gathering spaces?? Surely, it is time that Council provided/planned for more local/neighbourhood parks where these activities can be enjoyed closer to home, especially meeting the need of the increasing populations and high density housing builds. Extended use of other local open spaces of schools should also be considered as part of a bigger open space picture for Melbourne.

• Identifying cool places in the park that could accommodate people at risk of heat stress on very hot days

The Australian Native Garden is the main place that is cool on very hot days due to its irrigation. The rest of the park is mainly an open dry park during summer. Accepted health advice is that people at risk of heat stress stay indoors and stay hydrated, not being out in an open dry setting on very hot days!

We want your thoughts

What do you want to be able to do in the future to support a healthy lifestyle in Royal Park?

The FoRP strongly believes that Royal Park must retain its character as an iconic bushland park in the City with its open spaces enjoyed for passive recreation and enjoyment of nature. We do not consider more fixtures supporting personal exercising/healthy lifestyles should be installed; nor group exercising, such as disc golf. Or more intense use of the Park for e.g. recreational bike riding.

Lighting in association with sporting facilities

Lighting associated with sporting activities in Royal Park is extensive, obtrusive and has significant negative impacts. See our detailed comments set out under Theme 7. The new Master Plan must address and minimise the negative impacts of sporting lighting with strong strategic direction(s) and specific minimisation measures set out in the Implementation plan.

Just being in a natural setting is of powerful health benefit. It should not only be people's physical health that is catered for in Royal Park.

Theme 6 - Visitor experience

Background

The findings of the community safety audits and workshops should have been summarised and presented in the Discussion Paper. As participants in the community safety audits and workshops, it is our members collective understanding that bicycle/walker conflicts were the greatest safety concern, particularly the Capital City Trail. Additionally, poor sight lines for cyclists at path intersections. Safety was a key concern at the Royal Park Station/tram crossing/Poplar Road intersection for pedestrians, cyclists, golfers, tram drivers, drivers.

What are the current issues?

<u>Figure 4</u> – Royal Park precincts and features. Legends need corrections/additions:

West Precinct:

- The Wetlands comprises 3 sections: the siltation pond; the treatment ponds and the storage pond. There is NO 'waterhole'.
- White's Skink Habitat
- Add: Ross Straw Pavilion
- Add: Creek and tributary

Central Precinct

Question: Who owns the actual roadway - Brens Drive - through the State Sports Centre site to the tramline?

South Precinct: Add: Council depot

An issue that should <u>not</u> have to be catered for in the new Master Plan concerns commuters using car parks in Royal Park: using the State Sports Centre and Zoo car parks, then catching tram or train to work/elsewhere. Car parking in Royal Park is designated for "park users". Therefore, there is no requirement to, for example, install increased lighting for non-Park users such as commuters ... at the expense of Royal Park's status as a 'dark park'.

What are your thoughts?

In addition to the point above - calls for increased lighting in the Park must be tempered by the fact that Royal Park is a 'dark park'. This issue will be discussed in more detail under Theme 7.

Theme 7 - Movement through and within the park

What are the current issues?

<u>Lighting</u>

The safety audits undertaken in the park identified that the <u>lack of lighting</u> reduces accessibility, especially among women

The results of these safety audits should be published so that informed discussion can be held detailing specific issues, including lighting, so that the rationale for any strategic directions in the new Master Plan can be properly understood.

In keeping with the above paragraph, there is further documentation that should be considered in regard to lighting in the Park:

<u>Council's Lighting Strategy 2021</u> refers to:

- treating Royal Park as a 'dark space'....
- Royal Park is the city's only 'wild park'
- It contains large areas of landscape that approximate a natural condition
- ... intrusive light can have a negative effect on animals.

[Research by University of Melbourne and others has shown that nighttime lighting can detrimentally affect birds behaviour.]

<u>Royal Park Master Plan 1997</u> objective: *Encourage Royal Park's role as part of a wider open space wildlife network*. Designation of Royal Park as a 'dark park' serves to protect its nocturnal wildlife and thus its habitat and biodiversity values.

A statement from Council's <u>Nature in the City – Thriving Biodiversity and Healthy Ecosystems'</u> (2017) strategy is pertinent: *In order to increase biodiversity, urban stressors and threats that undermine the quality or extent of nature in the city will be identified and reduced. For example, some of these threats include <u>artificial light at night</u> which affects both biodiversity and human health and wellbeing.*

AS/NZS 4282-2019 <u>Control of the obtrusive effects of outdoor lighting</u> states: The obtrusive effects of the lighting system may be significantly influenced by ... areas of special significance, e.g. having cultural, environmental, historical or scientific importance. This statement can be re-read to make the point that obtrusive lighting in Royal Park could significantly influence environmental areas. This report also has a section on the <u>impact of external lighting on biota</u>.

The above Standards detail technical parameters that should be used in any Park lighting to mitigate the impacts of lighting in the Park; including our call for the retrospective application of the Standards (recent changes to LED globes has increased brightness and colour of the lighting).

A report by lighting expert, Dr. Barry Clark, is relevant to discussions of public lighting and safety. It can be accessed online through the following link:

 Parliament of Victoria

 https://new.parliament.vic.gov.au > attachment-documents

Outdoor lighting practice needs to be based on facts, not ...

27 June 2021 — Outdoor lighting practice needs to be based on facts, not myths. Barry Clark PhD. (bajc@alphalink.com.au). Director, Outdoor Lighting ... 15 pages

In summary in regard to Lighting, the Friends of Royal Park wish to see Royal Park's status as a 'dark park' maintained in the new Master Plan and cite the above documents to support minimal and minimised lighting in the Park in consideration of this theme: Movement through the park, as well as other themes: Caring for nature, Recreation and community well being and Visitor experience.

Master Plan Refresh to consider

- Identifying the most important movement corridors and destinations through and within the park for different types of users
- Defining a hierarchy of paths so that through movement doesn't negatively impact the amenity, safety and permeability of the park
- Identifying key routes or conflict points for safety upgrades

These three points are interrelated and our comments reflect this:

<u>Access</u>

Movement <u>into</u> the Park is an important issue. Detailed comments will be submitted under the following Theme 8 – Parking, roads and transport.

Hierarchy of paths

All paths within Royal Park should be consistent with its status <u>as a park</u>. If, as stated, amenity, safety, permeability and natural values of Royal Park are not to be negatively impacted then all paths should be considered as <u>recreational</u> paths. This includes the system of asphalt paths shown in the Council's Transport Strategy 2030. These paths are shared paths. As <u>recreational paths</u>, the new Master Plan must direct that pedestrians have right-of-way and that cyclists must give way to pedestrians – see VicRoads guidelines: <u>https://www.vicroads.vic.gov.au/safety-and-road-rules/pedestrian-safety/using-shared-paths</u>.

Reference should also be made to the Victoria Walks reports:

Victoria Walks
https://www.victoriawalks.org.au > Assets > Files PDF

Shared paths

Shared paths are the most common form of off-road **cycling** facility in Australia (Queensland DTMR 2014). **Victoria Walks** has significant reservations regarding. 40 pages

and summarised recommendations:

Wictoria Walks

https://www.victoriawalks.org.au > Assets > Files PDF

Shared paths - finding solutions

This position paper is based on **Shared Paths** – the issues, a comprehensive research paper produced by **Victoria Walks** in March 2015. It included a literature ... 4 pages

The FoRP concurs with the recommendations of Victoria Walks and VicRoads for shared paths, with additional comments:

- bicycles must only use the asphalt parks within the Park
- there should be no 'shortcutting' by cyclists anywhere in the Park, creating eroded compacted tracks through parkland. These degraded short-cutting tracks are unacceptable, irresponsible and detrimental to parkland and its natural values. They are not necessary for cyclists' travel as an adequate system of asphalt paths is available within the Park itself and on-road. The new Master Plan must make strong strategic direction(s) to address the detrimental impacts of cyclists, both in behaviour and on the parkland.

[It is noted that King's Park in Perth, a noted bushland park close to the city, does not allow any cyclists]

 FoRP supports upgrades to on-road cycling paths around Royal Park to encourage and facilitate bicycle riding. - commercial delivery cyclists should not be allowed in the Park.

Capital City Trail

The Capital City Trail (CCT) through Royal Park is highly dangerous for pedestrians due to the many and very fast riding cyclists, both commuter and recreational, often abusively so. A particularly bad section is the steep inclines between McPherson Field and the Royal Park West Remnant Site. The CCT is a shared path so should conform to VicRoads and Victoria Walks guidelines. Measures undertaken in 2020 by the CoM have been ineffectual in slowing cyclist speed.

The FoRP therefore recommends that a separate CCT be constructed along the same corridor as the particular section cited above and the existing CCT be made 'pedestrians only'. A separate CCT could run inside the existing fence along the railway line from the Manningham St bridge to the Royal Park Station. A bridge connection over the tramline be necessary to complete the new path.

Informal paths

It is known that informal paths used by walkers occur throughout the Park. Some are 'desire' tracks; (e.g. across the grassland Circle and the diagonal path south of the tramline across parkland towards the North Park tennis courts); others appear more informal tracks wandering through the Park's open spaces; many are 'ephemeral'. Assessment of informal paths in the Park, their need, usage and impact on the Park should be subject to a wider discussion before any definitive suggestions as to permanency.

Theme 8 – Parking, roads and transport

Background

It is important to reiterate that parking in Royal Park is "for park users". This was established in the 1980s at the time of the rationalisation of car parking around the Zoo. Car parking for non-park users, e.g. commuter parking, should be discouraged.

What are the current issues?

Car parking

As stated, much of the Park's 8 ha of car parking is not regularly used or well laid out. Conflict arises when major events take place at the Melbourne Sports Centre or the Zoo, including during holiday periods. The new Master Plan should not succumb to the calls, particularly by the Zoo for increased parking in Royal Park citing increasing visitor numbers, events and increased parking demand. Arguments the FoRP and other Park groups have previously put forward include:

- figures cited by the Zoo to justify the need for more car parking were found to be significantly inaccurate by analysis of the trajectory of Zoo visitor numbers from their annual reports.
- the Zoo fails to promote public transport use to the Zoo; this is in stark contrast to Taronga Zoo in Sydney where public transport and entry costs can be combined.

- the cost of parking environs the Melbourne Zoo is minimal (\$2 for 5 hours); again the contrast with Taronga Zoo is stark – minimal amount of nearby parking at cost of \$30+.
- calls for more car parking come with increased negative impacts on the Park –
 increased vehicle movements, longer periods of use, increased lighting, greater
 degradation, loss of amenity, impacts on wildlife and the Park's natural values.

Use of car parking areas by non-park users is not supported. This includes commuters who park then catch train and tram; staff at external organisations, e.g. RCH; construction workers at nearby developments. Such use is aided by minimal parking fee for Zoo parking and no fee/no time limit at the Melbourne Sports Centre or lack of Council enforcement when time limits are in place thus denying genuine park users parking spaces. Measures should be recommended in the new Master Plan to ban/deter parking by non-park users.

Overflow car parking areas

Another issue of concern is overflow parking areas, which we see as detrimental to the Park's parkland values. Overflow car parking areas were established to allow occasional additional parking for major events at the Zoo and SNHC, whilst maintaining grassed parkland. This is not what has occurred.

Easily accessible and cheap parking around the Zoo has meant the overflow car parking areas are now regularly used. Instead of remaining grassed areas, they are denuded or have been converted to gravel surfaces.

Similarly, free parking at the Melbourne Sports Centre has meant its overflow car parking areas are regularly used and are bare, degraded areas, certainly not in keeping with maintaining natural parkland.

And continuing approval by Heritage Victoria to allow overflow car parking at Brens Pavilion was an ill-informed decision as it will see parkland denuded, degraded and with vehicles an unsightly intrusion into the parkland setting.

Failure to promote use of public transport to Royal Park

Surely this is a key issue to be addressed by the new Master Plan as it impacts on many of the issues raised above in regard to parking. Rationalisation of car parking demand and parking areas should be accompanied by strong encouragement to use public transport for the majority of visitors to the Park, including:

- users of all sports facilities in the Park
- Zoo visitors and staff general visitation and major events
- Melbourne Sports Centre visitors, staff, athletes and their major events
- general park visitors

Access to Royal Park

'Key issues include but are not limited to car parking encroaching on pedestrian paths, <u>no clear</u> <u>pedestrian crossings from Royal Park Station to the Zoo and limited pedestrian crossings to the park.</u>'

The main road system in the Park comprises Poplar Road, Macarthur Rd, Elliott Ave and the main boundary roads: Park Street, Oak/Manningham St, Flemington Rd, Gatehouse St, The Avenue. It is important that access to the Park is safe, convenient and functional. We recommend improvements to key entry points:

- Royal Park Station/tram/Poplar Rd intersection. This multi-function, multi-user, multi-destinations, multi-links point has Council funding and Dept of Transport and Planning approval with designs on hold pending the LXRP. The FoRP continues to support this important upgrade, considers it has priority over the LXRP design and argues that it should proceed as soon as possible and NOT have to wait until the LXRP has been constructed.
- Flemington Road has often been described as a barrier for residents of North Melbourne to easily access Royal Park. One particular entry point: Melrose St/tram/Flemington Rd is such an example; it is narrow and dangerous and especially for disabled park visitors. The on-ground path entry into the Park likely does not meet disabled access standards. A safety and traffic engineering solution must be sought to allow residents, and visitors using public transport to access Royal Park's open space and facilities.
- Crossing the long section of road through the Park Macarthur Rd/Elliott Ave between two major parts of the Park is problematic with only one safe crossing at the tram lights on Elliott Ave. However this crossing does have good links with the Park path system. An appropriate crossing could be considered if/when the access drive to Brens Pavilion is transferred to The Avenue and the land returned to parkland, taking all Park users origins/destinations into account.
- The pedestrian road crossing across Gatehouse St at Park Gve to Nature Play has poor sight lines for vehicles and vehicles frequently stop across the crossing.
- The park entry at Park St/Upfield Trail has been earlier raised as requiring improvement part of the LXRP.

Master Plan Refresh to consider

Additions as highlighted:

- Reducing speed limits to increase safety and amenity in and around the park.
- Prioritising walking with clear, safe crossing points through and around the park.
- Prioritising use of public transport to Royal Park with specific measures to achieve this
- Rationalising the amount of car parking in the Park, including use of overflow parking
- Improving car parking layouts to make them more efficient
- Discouraging commuter car parking and parking by non-park users
- Better enforcement of
- Improving access into the Park

A final comment for this Theme: the Friends of Royal Park continue to totally oppose the East West Link or any iteration of it being built in the Park.

Sincerely,

Primrose Lentin&Kaye OddieConvenorSecretary