



*Royal Park's open space and environmental values are under threat from the new Royal Park Master Plan!*

## Draft Royal Park Master Plan Briefing Notes for Submissions

The four community Park groups: **Friends of Royal Park, Parkville; Royal Park Protection Group, Parkville Association** and **Protectors of Public Lands Victoria** - have prepared some briefing notes to assist making submissions about the **Draft Royal Park Master Plan** released for public comment (Nov 25 – Feb 23).

We cannot emphasise enough that as many submissions as possible are made by members and their neighbours, friends and others who use the Park to protect it from what we see as **an intensification and expansion of active sporting use to the detriment of informal, passive recreational use and the Park's environmental values and amenity.**

The **Draft Royal Park Master Plan** document can be found on the City of Melbourne's website: <https://participate.melbourne.vic.gov.au/royal-park-master-plan-review>

Click on 'Learn More' and scroll down to 'Explore the Draft Royal Park Master Plan' and click on the PDF document. Recently released 'Background documents' on Conservation Management and Biodiversity/Ecology can be found under Additional documents.

If you have already completed the online Survey, please consider making a further, more detailed submission and email to: [park.planning@melbourne.vic.gov.au](mailto:park.planning@melbourne.vic.gov.au)

### **Our concerns with the Draft Master Plan include:**

- **Intensification of active sporting use** of the Park; extended use of sports facilities
- **Alienation of parkland for more sports facilities**, including 3 new ovals, tennis court, 5 multi-purpose activity areas, mini golf course, disc golf
- **Downgrading of the passive and informal recreational use** of the Park and its open space amenity
- **Formation of paved paths through the Grassland Circle and other areas**
- **Formation of five 'doughnut' circuits/paved paths** around ovals for "uninterrupted exercise"
- **Increased lighting of sports ovals and paths**
- **An inadequate biolink** corridor through the Park, rather than consider the whole of the Park as a biodiversity area and **before preparation of a Landscape/Biodiversity/Planting Management Plan.**
- **Extension of Nature Play** into parkland for older children's activities
- Failure to address the **dangerous Capital City Trail** conflict between speeding cyclists and pedestrians

More detailed comments with references to the Draft Master Plan document relating to these concerns are provided below to guide submissions. The Draft Master Plan includes specific plans and tables of actions for five precincts: Royal Park North, Royal Park East, Royal Park Central, Royal Park South, Royal Park West.

### **Intensification of active sporting use of the Park; extended use of sports facilities**

**&**

### **Alienation of parkland for more sports facilities, including 3 new ovals, tennis court, 5 multi-purpose games areas, mini golf course, disc golf**

- *'Upgrade sporting amenities to support greater diversity and participation'*. According to the Council's Recreation Facilities Provision Framework policy, this means longer hours and greater number of days that the sports facilities will be used ... with increased sports lighting (with another three ovals to have the intensive sporting lighting installed – Ryder, Poplar, Walker ovals)
- Proposed conversion of what is an existing informal open space area (Lawn 7) south of the State Netball Hockey Centre to three ovals. [It is considered highly likely that a pavilion would be added in the future.]
- Installation of five multi-use games areas ("netball court sized" with basketball/netball rings/other activities) throughout the Park: in Royal Park North, Royal Park Central, Royal Park East, Royal Park South and Royal Park West.
- Building another tennis court at the North Park Tennis Club (Royal Park South)
- Designating areas for disc golf and orienteering sporting activities (Royal Park Central)
- Extending Nature Play by significant amount into parkland to provide facilities for older children's recreational activities (Royal Park South).
- Building a mini-golf course and practice nets at the Golf Course (Royal Park East)

### Comments:

Under the Draft Master Plan's Vision, the emphasis is put on sporting/active recreational use of the Park. This ignores the significant passive recreational use of the Park. This point should be reworded:

- Plan for increased use and ongoing enjoyment of the Park through a balanced provision of active and passive recreation.

Council should be building any new sports facilities elsewhere, not cramming more into Royal Park. Council owns land and should be acquiring land or working with the State Government on using land set aside for open space in the nearby urban renewal area of Arden, which is close to the many apartment developments being built in Kensington and North Melbourne. Sportspeople using Royal Park's facilities mostly do not live in the municipality, so could easily drive short distances further to sports facilities in Arden and Macaulay and public transport is close by.

*"Royal Park has lost 30% of its sports facilities"* . Don't be misled by this comment made by Council officers during Master Plan briefings to justify increasing sports facilities in the Park. This only dates to the post WWII period, when many sports grounds were built in Royal Park for returning soldiers' recreation, then were reduced in line with the objectives of the 1984 and 1997 master plans to restore a balance between active sports and passive recreation and to return to natural landscapes and native vegetation. It could just as easily be argued that the comparison should be that Royal Park has lost a much greater amount of parkland since early European settlement to justify a return to more open space, not more sporting facilities!

## Downgrading of the passive and informal recreational use of the Park and its open space amenity

The many ways that the Draft Master Plan has downgraded the informal passive recreational use of the park and its open space amenity have been referred to above (and more below).

Telling is the change in objective from the 1997 Royal Park Master Plan:

- *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.*

to the principles set out in the 2024 Draft Master Plan:

- *Plan for increased use and ongoing enjoyment through the provision of sport and recreation spaces and activities across the park. Plan for the diverse needs of park users.*

[emphases added]

Gone is a 'balance' in the provision of recreational activities between sport/active recreational activities and casual/spontaneous/individual/passive recreational activities.

And use of the non-specific term 'diverse needs' of park users?

This is despite Council's findings\* that the majority of Park users enjoy it for its passive recreation and open space values, to quote:

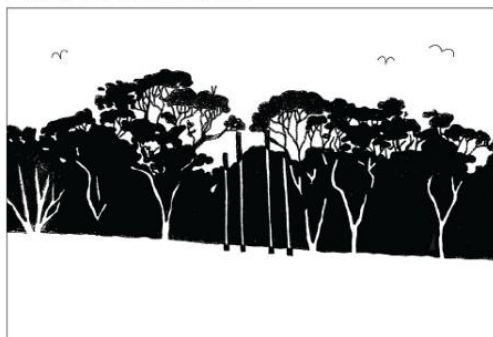
\*Theme 2 Caring for Nature, page 22 of the draft Master Plan document:

*The natural landscapes of Royal Park, including plants, animals, the landscape characters and the large trees providing shade are highly valued by the community. These landscape elements were noted as important more than **1700** times across multiple themes during previous engagement.*

Loss of open space parkland, intensification of sports use and facilities, constructing paths, donut circuits, increased lighting in the Park, detrimental impacts on wildlife, biodiversity and habitat values ... show the balance has been tipped towards a 'Recreation Master Plan'.

Images of tree form and silhouette (cf 1997 RP Master Plan) now have football goal posts placed in front of them and the sound of footballs being kicked!

Tree form and silhouette



The soft thud of a football soaring towards the posts  
Nestled between the iconic silhouette of eucalypts

## Formation of paved paths through the Grassland Circle and other parkland areas

The draft Master Plan proposes "*Design and construct a network of paths that enable active transport and access to nature, pavilions and facilities*". Cf Actions, Royal Park East, p. 41.

Apart from those shown on the precinct maps, there is no understanding where other paths might be constructed under this proposal. Totally unacceptable Park planning!

The Draft Master Plan also states: *“Implement walking, wheeling and running circuits that connect key features and destinations within the park”*, but there is no qualifier about avoiding impacts on biodiversity or fragmenting the Biolink.

The iconic Grassland Circle open space is proposed to have criss-crossing, paths. See Figure 14, Royal Park South, p. 52.

Why does the important Brens Remnant Vegetation Site have to have formal paths constructed around it (Figure 13, Royal Park Central, p. 48), truncating its biodiversity connection with the Park? And to have joggers circumnavigating the Trin Warren Tam-boore Wetlands.

How realistic or responsible is it to construct paths alongside the narrow, steep-sided Royal Park creek, being an important biodiversity area?

Or constructing a path through the golf course when there is a perfectly good footpath along The Avenue?

Informal paths through the Park are ephemeral, as Covid/post Covid days showed. There is no justification for a system of path construction where, in actuality, passive recreation Park users enjoy the spontaneity of walking ‘off track’ or on dirt tracks.

Such paths are described as ‘*exploration trails*’... and would be constructed in *“a variety of materials”* .... again this would constitute loss of natural parkland; increase in heat island effect\*; constrain/control informal walkers with loss of spontaneity in walking around the Park.

\*Heat island effect of path surfaces – see comparisons in diagram below:



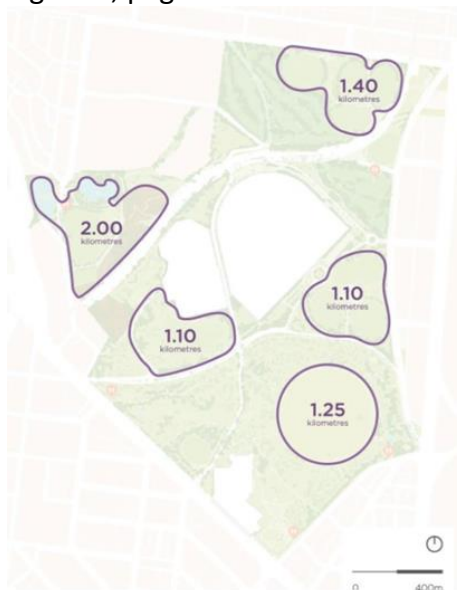
Council’s Transport Strategy 2030 designates the network of existing asphalt paths in Royal Park as bicycle routes. Will the proposed additional paths be open to bicycles – creating inevitable conflict/safety risk with pedestrians? The draft Master Plan has made no attempt to control cyclists’ use of shared paths (i.e. give way to pedestrians, speed max. 20km/hr). It also fails to address the detrimental impact of cyclists short-cutting through parkland, creating rutted tracks – just to save a few seconds – instead of using the nearby asphalt paths!

## Proposed strategic movement corridor paths

Is it realistic or safe to propose a wide, lighted path along the tramline, aka 'movement corridor', to encourage walking and cycling at night ... along 3 km through the Park?

## Formation of five 'doughnut' circuits/paved paths around ovals for "uninterrupted exercising"

Figure 9, page 28



Circuits would have a generous width of up to 2.5m and paved (surfaces to be determined). Some would have lighting.

It is known that joggers like longer, destination runs, not short circuits around ovals in the middle of a Park.

Walkers prefer informally finding their own way through open space areas of the Park.

People enjoy a setting of openness, being part of the parkland setting, not confined and controlled by infrastructure such as formed paths.

Approx 2 km of existing grassed parkland would be lost from the Park's natural landscape by excision for new constructed paths, i.e. a loss of biodiversity; adding to heat island effect and loss of spontaneity in walking around the Park.

When originally mooted, the 'circuit' paths would have "a generous 2.5m width" ... does this mean future addition of gym stations is intended?

It is totally environmentally irresponsible to propose a 2km circuit path around the Wetlands, habitat and remnant vegetation areas, compromising the quiet conditions for birds and other wildlife, and protecting vegetation, not to mention the known dangerous conflict with cyclists on the CCT.

## Increased lighting in the Park for sports ovals, paths, roads, tramline

Under Council's Lighting Strategy, Royal Park is supposed to be a 'dark place' for the benefit of its wildlife – particularly owls, bats, moths and nocturnal animals. The detrimental environmental, social, health impacts of ALAN (Artificial Light At Night) are increasingly becoming recognised.

The Draft Master Plan proposes to (1) light three more sports ovals, making a total of 9 ovals with floodlighting and (2) to install sports grade lighting, which is brighter, bluer and far more detrimental to nocturnal wildlife. Additionally the SNHC has tower floodlights, whose light spill extends over much of the Park, and the two tennis complexes have floodlighting (one until 11pm). Then there is proposed extensive lighting of major and minor paths through the Park, and optimisation of roads and tramline lighting:

*Design and construct lighting along the tram line to support year-round walking, running, cycling and public transport access.*

however, the tramline runs in part along the Zoo, but the Zoo opposes lighting for the impact on its animals.

Why should Royal Park be "seen from afar" as the Draft Master Plan states? It's telling that one of the images put forward for the Park says: "As the skies darken and the stars appear" .....

Wind and sky



The clouds slowly floating away  
A gentle breeze and the rustling of leaves  
As the skies darken and the stars appear

.... then all the sports lighting is turned on ... and Royal Park can truly be “*seen from afar*”!

Why does the Master Plan state that sports lighting should be turned off at 10pm or ‘*outside official hours of operation*’ (whatever that means). What should be stipulated is that sports lights must only be turned on for actual play and must be turned off as soon as active play on the sports oval ceases.

Currently Council inexplicably does not have the technical expertise to remotely control sports oval lights and they commonly, irresponsibly blaze away with not a player in sight.

It is inexplicable why the drive into the Ross Straw Pavilion (Figure 15, Royal West, p. 55) - where access is limited by locked bollards outside playing hours), should be lit – directly impacting on the adjacent, significant remnant vegetation site and its fauna. Why should lighting to “*increase community usage*” take precedence over protecting biodiversity areas?

It is noteworthy that the background document for the draft Master Plan ‘Ecology and Biodiversity Report’ extensively addresses lighting and biodiversity in its appendices, yet stronger, more stringent recommendations have not been included in the draft Master Plan so as to protect and enhance the Park’s biodiversity. Why has a detailed Lighting Plan not been prepared as part of the Master Plan, so that full and proper assessment can be made?

What is the point of lighted paths through Nature Play and into the Park - when children are supposed to be in bed at night (Figure 14, Royal Park South, p. 52)? And across parkland to a dead end – the former tram stop no. 23, now removed?

Much is made associating lighting and safety in the Draft Master Plan. ‘Safety’ is subjective, so instead of the overriding Vision statement:

- Ensure the park is a welcoming, safe and inclusive place for everyone.

reword to:

- Ensure safety is included in all park actions to create a welcoming and inclusive place for users and visitors.

### **An inadequate Biolink**

The Draft Master Plan really falls down when it comes to the natural landscape and biodiversity values of the Park. Nothing new has been added to protect and enhance its landscape character of open grassy woodland, passive recreational enjoyment of the Park, its biodiversity and wildlife. Rather much has been taken away. The Draft Master Plan changes the emphasis of the much-vaunted 1997 Master Plan from one recognising the landscape character of Royal Park to one where sports and active recreation are the focus.

Urban planners don’t understand the intrinsic value of open spaces and want to divide them up, fill them with structures, as we see in this Draft Master Plan with more sports ovals, tennis court, intensification of sports use, multi-use games areas, paved circuit paths, lighting and more paths, expansion of Nature Plan – concerns already elaborated on above.



**The proposed Biolink**, as coloured aqua/hatched on the maps (Figure 7, p. 22) and precinct maps), is applied to select sections of the Park; it excludes established vegetated areas and known biodiversity and habitat areas, such as south of the SNHC, an extended wide semicircular swathe above the Children’s Hospital. Why? Is this because the Council wishes to build more sports ovals, and play activity areas in these areas of parkland? Inappropriate uses are included within the proposed Biolink, which is supposed to emphasise the environmental and biodiversity values of the Park. The proposed Biolink has been made to fit around sporting and other structures, not the other way around – illustrated by the examples below:

- New ovals and disk golf created in known Swift Parrot feeding area
- The Biolink cut back to accommodate a new tennis court
- Fragmentation of habitats with paths and lighting
- Paved paths constructed through The Circle – known habitat for ground dwelling quail
- Large swathe of established vegetated areas of trees, shrubs, grasslands (south and southwest of the Circle) excluded from the Biolink - see Figure 14, Royal Park South , p. 52
- Another swathe of vegetated parkland, south of the SNHC and north of the Urban Camp are excluded from the Biolink – see Figure 13, Royal Park Central, p. 48. This includes the area where Swift Parrots feed.
- The Billabong, a waterbody, surely should be included in the Biolink – but is excluded – see Figure 14, Royal Park South ... yet the Moonee Ponds Creek waterway, enclosed in concrete is included?!
- Paved paths constructed around Brens Remnant Vegetation (and key habitat) site, truncating its connection to the rest of the Park
- Many new paved paths carved into parkland, including five ‘donut’ circuit paths
- Poor controls set out for sports lighting ... allowed ‘as of right’ until 10pm
- Owls, Tawny Frogmouths and moths that use the Park will be compromised by the additional and intensification of lighting

Fauna needs to be more fully recognised - there are 152 species of birds, including some endangered, rare and migratory, and the Park plays host to microbats and endangered Grey-headed Flying Foxes.

In the Draft Master Plan, it states under Caring for Nature (p.21):

*“Supporting biodiversity within urban environments is critical. Biodiversity contributes to healthy, stable and resilient ecosystems, provides essential ecosystem services and contributes to positive human health and wellbeing outcomes. Due to its size and native vegetation character, Royal Park has higher biodiversity value than other parks in the municipality. It is our most ecologically diverse park, containing remnant indigenous vegetation, and many species living within it cannot be found elsewhere in the municipality.”*

We feel it is premature to set out a ‘Biolink’ in the Master Plan; instead the whole of the Park should be set aside as one biodiversity entity ... given the statements above about the importance of the Park’s biodiversity. Thus, a landscape, biodiversity (this includes flora and fauna) and planting management plan should be prioritised, so as to determine significant biodiversity areas and features to be protected and enhanced and so the ‘Aspirations’ set out in the Draft Master Plan (p. 21) can be met. It is noted that many valid recommendations made in the background document ‘Ecology & Biodiversity Report’ have not been incorporated into the draft Master Plan. It is also noted that the ‘Ecology & Biodiversity Report’ itself has not addressed a number of important on-ground issues, e.g. relating to vegetation, because a lack of wider consultation and inadequate data collection.

\*\*\*In your comments in submissions, call for the whole of Royal Park to be one biodiversity entity with no excluded areas and for a Landscape, Vegetation, Biodiversity and Management Plan to be prepared first following wide expert consultation. This would allow a properly informed Biolink to be created to guide the way forward for the next 20 years.

### **Extension of Nature Play into parkland for older children's activities**

This is a significant proposed extension into parkland (see Figure 14, Royal Park South, p. 52) – parkland with established stands of trees, shrub beds and grassland. The aim, as described in briefing sessions, is to cater for older children/teenagers' activities. Would this include infrastructure ... older children/teenagers are hardly likely to want to sit on the ground having picnics! So more excision of parkland to build bike circuits/activity spaces/skate park???

### **Failure to address the dangerous Capital City Trail conflict between speeding cyclists and pedestrians**

This has been commented upon above. It is a problem the Council has been well aware of for years and it was supposed to be addressed in the new RP master plan. Why has a separate bicycle path not been explored and proposed, e.g. alongside the existing shared CCT path within the railway corridor? It is unacceptable that the very dangerous CCT section in Royal Park West has not been addressed.

As stated above, proposed new paved paths through parkland will encourage cyclists' usage, facilitate cyclist 'speedways' and increase conflict and safety risk to pedestrians.

And as has been referred to above, 'ad hoc' bicycle riding through parkland, instead of being on the formed asphalt paths, apparently is acceptable? Where is the ban on mountain bike riding in the important Remnant Vegetation Sites or off-track through parkland?

We have tried to set out some of the major concerns about the Draft Royal Park Master Plan to inform and guide you in making submissions.

**We cannot emphasise enough that as many written submissions as possible are made by members, friends and the many other people who use and value the Park to protect it from what we see as an intensification and expansion of active sporting use to the detriment of informal, passive recreational use and the Park's environmental values and amenity.**

Submit by email to [park.planning@melbourne.vic.gov.au](mailto:park.planning@melbourne.vic.gov.au)

Closing date for submissions is Feb 23, 2025.

Please feel free to contact any of our organisations for further information, discussion and comment:

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