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## DRAFT ROYAL PARK MASTER PLAN

### SUBMISSION

#### Preamble

The Friends of Royal Park, Parkville Inc is a long-standing community organisation with close involvement in and love of Royal Park. Our objectives include:

- 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.
- To develop partnerships and opportunities with other groups and organisations with similar objectives to those of the Friends of Royal Park, Parkville.

To these ends, for close to twenty years, the FoRP has undertaken many activities in the Park, including plantings, weeding, seed collection, propagation of indigenous plants in our nursery, hosting community and corporate plantings, bird surveys, participating in Council bioblitz and other projects, working closely on the remnant vegetation sites, special presentations, including active online media profile, working closely with Royal Park's open space managers ... And our membership includes people with tertiary qualifications in environment and related topics.

We therefore believe our submission to the draft Royal Park Master Plan is backed by in-depth knowledge, expertise and understanding of Royal Park.

### SUBMISSION

Royal Park is recognised as an iconic, highly valued bushland park in the inner city. Its values were encapsulated in the 1997 Royal Park Master Plan with a 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.*

The Friends of Royal Park, Parkville (FoRP) considers these values should be carried forward in the new Master Plan, there is no reason not to. The FoRP also considers that a balance between active, sporting recreation and informal, passive recreation in Royal Park should

be continued. These values should not be sacrificed to cater for increased populations in the municipality and their active sporting requirements. Catering for informal, passive recreation and enjoyment of open space is equally important for people's health and wellbeing.

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

Therefore, we consider a more appropriate Vision for the new Master Plan is:

- Protect** Royal Park as a natural, expansive place that welcomes people to view and experience its unique history and distinctive Australian landscape and ecosystems.
- Invite** Melburnians and visitors to embrace its rich and living Wurundjeri Woi-wurrung history and cultural values and to walk together in recognising connections with Royal Park's land and environment.
- Preserve** Royal Park as a place for nature, recreation and storytelling.
- Encourage** use and enjoyment of the Park through balanced provision for different recreational activities, ranging from active sport to informal passive uses.
- Prioritise** Royal Park as a Dark Sky Place.

Our comments will relate our Vision to what the new Royal Park Master Plan should be.

# 1 Introduction

## 1.1 City of Melbourne commitment to Reconciliation

The FoRP fully supports the recognition in the new Royal Park Master Plan of Wurundjeri Woi-wurrung and their association with Country that is Royal Park, and the statement:

“Earlier Royal Park master plans were silent on Aboriginal Traditional Ownership, their association with Country and continuing cultural practice and values. This master plan seeks to fundamentally embed Wurundjeri Woi wurrung perspectives in guiding Royal Park’s future. It creates opportunities to further self-determination and increase Traditional Owner participation in decision-making over the management and uses of the park.”

Firstly, we agree with comments earlier made by Professor Felson that some explanation be provided as to the earlier ‘silence’. So it is suggested insertion of a second sentence:

This was in part due to the plans being created before key legislation, such as the Victorian Aboriginal Heritage Act (2006) and when there was not wider inclusion of Traditional Owners in these types of documents.

Secondly, we recognise there are intangible and tangible Traditional Owner cultural associations with Royal Park. To try to determine more of the tangible knowledge about Royal Park should be part of this introductory section. This would be in a wider collaboration with Traditional Owners and others - resourcing, researching, accessing and understanding - allowing an intertwining of tangible and intangible - enhancing Wurundjeri associations and recognising and respecting them in relation to Royal Park.

Thus the last sentence in this section could be reworded to reflect such collaboration:

The master plan represents our commitment to partner with the Traditional Owner of Royal Park – the Wurundjeri Woi-wurrung – and to [‘walk together’](#) for the duration of the plan to realise their aspirations and vision for this important place.

### Figure 2 – Journey of the park

The Conservation Management Plan provides much Aboriginal history that could have been incorporated into the diagram to better illustrate Traditional Owners’ journey of the park. That it was an important meeting place for Aboriginal tribes; that it would have been a hunting ground; corroborees were recorded being held there .... of some of the good things, rather than subsequent negative things that happened .... reference to sea levels could be accompanied by pictures of fossil shells found in the park ... rather than walking across to the other side of Port Philip Bay.

If a stylised diagram is to form an integral part of the Master Plan, then it should better reflect timeframes, descriptions, species. For example:

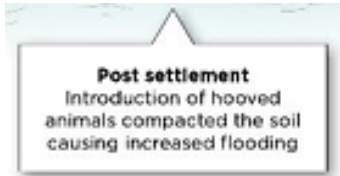


Loss of livelihood was the most important factor in Traditional Owners journey through the Park following British/European settlement. Where is the evidence for major bushfires in the Royal Park story? Instead it was cutting down of trees, introduction of non-native

animals, grazing (incl. sheep), loss of food sources, loss and pollution of water sources, usurping of land, that contributed to the 'Improper care of Country'.

Replace '173 years ago' text box with a 'Post settlement' text box:

Improper care of Country resulted in the loss of Aboriginal livelihoods (introduction of grazing animals, loss of timber and food sources, pollution of water sources, usurping of land.



Wrong connection assigning blame solely to hooved animals for increased flooding. Rather, major contributors to increased flooding were the loss of trees and vegetation, urbanisation and buildings that increased stormwater run-off and the flooding of creeks and rivers.

Replace text box wording with: [Loss of vegetation, grazing and urbanisation increased flooding of rivers and creeks.](#)



Why are stylised rounded trees shown? Surely a more representative open gum tree form could be used.



Given the cultural importance of the 'Crow' to the Wurundjeri, why not move it to where the Emu is in the diagram? And check/properly rename it as a Raven.

And check that wallabies/kangaroos were not more prevalent than Emus and would be better representatives for the 'Journey of the park' diagram?



White's skink

### 1.2.1 Park history and context

paragraph 3, add:

Key to this is recognising that the creation of Royal Park was an act of dispossession. It disrupted the important custodial, cultural and other practices associated with the land, [contributed to loss of tangible knowledge](#) and had a catastrophic impact on the wellbeing of the Wurundjeri Woi-wurrung people.

#### Settlement story

paragraph 3

The park-like landscape was a reference to the royal domains of Europe, which comprised extensive estates that were set out as lightly timbered parklands rather than as a dense forest. *The open country surrounding Melbourne with its scattering of fine trees had been shaped this way because Aboriginal peoples had practised fire stick cultural burns before the arrival of settlers.*

This does not take into account the natural geography of Royal Park. 'The open country .... with its scattering of fine trees' (and expansive grasslands) is also due to the topography and

underlying geology (soils) (cf Leon Costerman’s texts). Also other land management practices were used by the Traditional Owners in addition to fire stick burning so the statement would be more correctly worded:

The open country surrounding Melbourne with its scattering of fine trees [and grasslands was shaped by its underlying topography and soils and further shaped by Aboriginal land management practices, including fire stick burning](#), before the arrival of settlers.

This would be consistent with the statement on page 13 (section 1.5.1 Landscape and heritage, paragraph 1) that recognises the relationship of Aboriginal use to the topography of Royal Park.

### State [and local](#) significance

Victorian Heritage Registration means state significance. CoM’s Open Space Strategy is a ‘local’ strategic document. ‘Local’ also applies to the statement given in paragraph 2, page 7.

Correction: Royal Park [was](#) also identified ....

Delete the next two paragraphs in the draft document, relocating them to a new section below – **Master Plans**. End above section with:

Any proposed changes to Royal Park, including implementation of actions outlined in the draft master plan, are subject to assessment against the Victorian Heritage Register statement of significance and the Heritage Act.

We believe a new section titled ‘**Master Plans**’ should be inserted next, so as to give greater relevance to the historical and contextual significance of the 1984 and 1997 plans in shaping the Park and in setting the scene for the 2025 plan.

### **Master Plans**

[As stated earlier, the development of Royal Park has been strongly shaped and guided by landscape architecture master plans of 1984 and 1997.](#)

[The 1984 plan by Laceworks Landscape Collaborative described four landscape images representing the landscape character of Royal Park and directing design and development proposals:](#)

- [– Landform and horizon](#)
- [– Sky and wind](#)
- [– Expansive grassland](#)
- [– Tree form and silhouette](#)

[The 1997 master plan by Chris Dance Land Design, reinforced and built on the 1984 principles and has excelled in leading the Park through the last 27 years.](#)

[The above landscape characters have been reinforced and reinterpreted in this draft master plan to reflect the park landscape that has since evolved.\\*](#)

[This 2025 master plan by the City of Melbourne, in collaboration with Traditional Owners, Wurundjeri Woi-wurrung and community, will respect Royal Park’s design heritage and begin a new chapter in the evolution of Royal Park.](#)

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\* the evolving landscape characters do not relate only to the [city skyline](#) – as the images in section 2.3 show: tree form, water, wind and sky also reflect the park landscape.

## **A social and healthy place**

para 1

Royal Park's distinctive landscape seamlessly integrates sport and recreation with nature.

This is incorrect; unfortunately there is no 'seamless integration', instead there are conflicts between sport and nature. Sporting recreation adversely impacts on the natural/ environmental values of the Park, through sporting infrastructure per se and particularly through lighting of sports ovals. Such lighting impacts on nocturnal fauna, such as microbats, invertebrates, including Zoo fauna. Reword:

Royal Park's distinctive landscape encompasses both active sports recreation and informal passive recreation in a natural setting.

This section on Royal Park being 'a social and healthy place' is biased towards its active sporting recreation use. It ignores the fact that Council's own consultation surveys show that the majority of Park users enjoy it for its informal, passive recreation and open space amenity. The one brief mention about informal recreation towards the end of this section significantly and incorrectly downplays this fact.

Active, physical recreation is not the only contributor to health and wellbeing in the Park. Mental health and social wellbeing are also important and are served by the Park's open space and informal, passive recreation opportunities. As stated in the Council's Nature in the City Strategy: *"It is widely accepted that connection to nature and place is vital to community health and wellbeing."* and *"The relationship between the city's ecology and the health of our community has never been clearer."* This is only cursorily acknowledged in this section.

The section should be rewritten, acknowledging up front that the majority of Park users enjoy it for its informal passive recreation; that active sporting recreation and informal passive recreation are both contributors to health and social wellbeing; that mental health and wellbeing (also known as nature therapy) and opportunities for socialising are also well served by the Park's open spaces and associated amenity. The many references to active sports in the Park should be condensed into 1-2 sentences.

## **Landscape and habitat**

1<sup>st</sup> sentence

The iconic Australian landscape character of Royal Park underpins the City of Melbourne's reputation for enhancing urban biodiversity.

*What is this statement supposed to mean???*

This section needs restructuring to allow better understanding, sense of progression and wider co-operation. Thus, suggested rewording:

The Royal Park master plans of 1984 and 1997 led the City of Melbourne to promote Royal Park's Australian landscape character of open grassy woodland with associated indigenous plantings; to promote biodiversity and to implement best-practice environment management techniques.

Royal Park serves as an important location to work in partnership with other organisations\* and the Traditional Owners in ongoing study and projects\*\* in ecology\*\*\*, horticulture and landscape design to better understand and preserve threatened ecosystems, such as native grassland and remnant woodland.

\* The involvement of 'other organisations' must be mentioned. For example, the University of Melbourne already is involved in projects in the Park. Over the life-span of the new Master Plan, other organisations, such as the Zoo, Birdlife Australia, Royal Botanic Gardens, Museum Victoria, Government departments, conservation groups, etc. could be potential partners.

\*\* 'projects' is a more encompassing term than just 'experimentation'.

\*\*\* 'ecology' is the driving force behind the landscape and horticulture projects in Royal Park. So list first; add remnant woodland.

## **Celebrating yesterday, today and tomorrow**

If we're celebrating **'yesterday'**, why isn't mention made of Royal Park's founding? It was set aside by Superintendent La Trobe in the 1850s as part of a wider necklace of parklands around Melbourne, which are still extant today, e.g. Albert, Fawkner, Studley, Yarra. They were set aside for the citizens of Melbourne "to provide the lungs for the city" and for their recreation.

Re **'today'**:

Nature is an extremely important component of the parklands along the Yarra and Maribyrnong as well as recreation. Therefore, add:

The park has strong visual .... Yarra and Maribyrnong River Valleys ... providing significant spaces for [nature and](#) recreation.

The bias shown in this draft master plan towards the 'sports' use of Royal Park is not valid and ignores its major use for informal, passive activities. Therefore replace with 'recreation', which includes both active and passive recreation:

History, culture, nature, [recreation](#) and community connect and coexist in Royal Park, providing an experience like no other within the City of Melbourne municipality.

**Figure 3.** This diagram has no understandable relevance to the Master Plan and is hard to decipher. Reference to Royal Park as part of the historic circle of parklands set aside by La Trobe might be a better diagram.

### **1.3 About this master plan**

#### **1.3.1 Purpose of the master plan**

Royal Park's landscape character is recognised and referenced as a significant factor in many sections of the draft Master Plan. So why is it not even mentioned here? Being a 'sanctuary for flora and fauna' does not equate with Royal Park's recognised and valued landscape character.

Insert as additional dot point:

- [Providing a distinct Australian landscape character](#)  
[*this encompasses its defined open grassy woodland character*]

followed by:

- [Providing a biodiverse setting for indigenous flora and fauna](#)  
[*'sanctuary' isn't the right word*]

Changes and trends since the 1997 master plan include - suggested change:



- Increasing municipal residential population and density, resulting in increased use and pressure on [open space and](#) recreation facilities.

### 1.5 Wurundjeri Woi-wurrung connection to Country

The draft Master Plan states Aboriginal connection to Country encompasses both tangible and intangible cultural heritage of the Park. Also that the Conservation Management Plan (CMP) has enabled a greater understanding of the Park’s historical and physical content and lists a number of significant Aboriginal sites. This is confusing in that some sites are modern constructed landscape features, e.g. the Billabong and the Trin Warren Tam-boore Wetland. Providing some explanation about the sites and cultural connections would lead to greater understanding.

Traditional Owners – the Wurundjeri – retain much intangible cultural knowledge of Melbourne. To recognise and reinstate Wurundjeri tangible associations with Royal Park, we support ‘walking together’ / collaborating to gather knowledge from many sources – archaeological, historical reports, archives, research – and contributions from a wider community. The addition of such information would add to the story of Wurundjeri association with the Park.

Below, some examples of tangible objects that could be considered for their relevance in recognising and reinstating Wurundjeri cultural heritage associations with Royal Park:

1. A stone tool found in the royal park west escarpment in 2012. It could date back 5000 years and be made of local (Moonee Ponds Creek) silcrete or chert (cf ‘An Aboriginal Archaeological and Historical Study’ by J. Freslov (2002). At the time and subsequently, it was recorded by Aboriginal Victoria. See photo below:



2. Observation of fossil shells (see Museum Victoria Royal Park specimen below) in the Royal Park West escarpment:



3. Stone scatters (silcrete) found along the Royal Park creek during recent vegetation works by Narrap Rangers in conjunction with CoM.



4. Wurundjeri traditional uses of plants – Beth Gott and others (e.g. Zola, N. & Gott, B. 1992 Koorie Plants, Koorie People. Koorie Heritage Trust, Melbourne/copy held in East Melbourne Library) – worked with Wurundjeri to identify plants, names and uses, for example:
- **Silver Wattle MOY-YAN (Wurundjeri) *Acacia dealbata*** The bark was used to make coarse string, and for medicine; the gum was eaten, mixed with burnt shell or ashes to make cement, and also applied to wounds and sores. The wood was used for implements, particularly to make bark buckets and axe handles. It flowers in late winter, the first local Wattle tree to do so. Black Wattle, *Acacia mearnsii*, called GARRONG by the Wurundjeri, has similar leaves, and was used in the same way.
  - **Yellow Gum EASIP (Wurundjeri) *Eucalyptus leucoxylon*** The wood was used for clubs and shields. The red flowers make this an attractive tree.
  - ***Banksia* species. Silver Banksia, *B. marginata* WAR-RAK (Wurundjeri)** The flower cones of all species of *Banksias* were soaked in water to make sweet drinks from the nectar. The dry cones of Silver Banksia, *Banksia marginata*, were used as strainers and to carry smouldering fire. Single flowers were used as fine paint brushes.
5. Investigation of the name **Quor-nóng** for Royal Park, as reported in the notes of A.W. Howitt in talking with Barak (cf <https://theconversation.com/rediscovered-the-aboriginal-names-for-ten-melbourne-suburbs-99139>) and which has been suggested by expert linguist, Professor Stephen Morey, La Trobe University, could mean ‘rising ground’ .... which would seem appropriate given the topography of Royal Park?



Royal Park - Quor-nóng

Investigating and including information such as above would enhance the new Master Plan in more fully recognising and appreciating Traditional Owner connections with Royal Park.

### 1.5.1 Cultural values assessment

#### Landscape and heritage

paragraph 3

The Traditional Owners celebrate the vast open spaces of Royal Park and the sense of it feeling like the bush in the city. However, while understory plants are prevalent across the park, including saltbush and kangaroo apple, and native grasses are present in many areas, there is no sign of murrnong, which was historically prolific along the Moonee Ponds Creek.

This is incorrect. Kangaroo apple is not “prevalent” across the park, as on-site inspection would show. Saltbush comprises a number of species in the park today: prostrate *Einadia spp*; shrub forms *Atriplex spp* and *Rhagodia spp*. with *Rhagodia parabolica* being by far the most widespread and dominant shrub in the park landscape. The statement implies that the species was part of the early Royal Park vegetation. However, *Rhagodia* is not mentioned in early settler accounts of the open grassy woodland landscape character and vegetation of Royal Park - encompassing ‘gum’, ‘she-oak’ and ‘wattle’ and the wide expanses of ‘fine’ grasses (cf Mattingley and others). It was not mentioned in Beth Gott reports. The Flora of Melbourne cites *Rhagodia parabolica* as “rare in Victoria” and it is not listed in the ‘Pre-colonial plant list for the City of Melbourne’ (Sinclair et al, 2021). It must be noted that the species is a recent introduction into Royal Park – at the time of the millennial drought when

other plants failed in revegetation projects and it was the only species that would grow (C. Nicholson, former Royal Park Officer, personal communication). That *Rhagodia parabolica* is now dominant and rampant and reducing biodiversity throughout the park is an issue that must be addressed in the Landscape, Vegetation, Biodiversity & Management Plan we propose in the Master Plan.

Thus, the above statement in the draft Master Plan should be corrected, deleting the reference to prevalence of saltbush and kangaroo apple, to:

..... However, while understorey plants are today prevalent across the park and native grasses are present in many areas, there is no sign of murrnong, which was historically prolific along the Moonee Ponds Creek.

paragraph 4

Growing more indigenous plants throughout the park and making timber available for cultural practices is recommended.

Growing indigenous plants throughout the park has been a management practice for many years and in keeping with the 1997 Master Plan, however, harvesting timber would go against the recommendations in the Ecology and Biodiversity report by N. Williams et al - that wood be left on the ground to provide habitat.

paragraph 7

At the time when Aboriginal people camped and gathered in the area around what is now the Trin Warren Tam-boore Wetland, it would have been resource-rich with kangaroos, wallabies, possums, fish, eels, frogs, ducks and other waterbirds.

Is it known that camps were only around the now Wetlands area? Or were they also on the higher grounds (cf Freslov 2002 quoting camping “*on the west side of the Sydney Road, now Royal Park*”)? Perhaps this information could be incorporated into the above statement?

### **Historical sites**

Aboriginal people, culture, heritage and history are completely excluded from Royal Park today. A lack of recognition is also notable at the park's historical sites.

Reference and further validation of the fossil shells (? midden) and stone tool found in the royal park west escarpment and stone artefacts in the Royal Park creek area could allow recognition of Aboriginal presence and practices in Royal Park? And also the scar tree that was in the grounds of the Zoo?

### **1.5.2 Next steps in assessing Aboriginal cultural values and cultural heritage**

Given the size and scale of Royal Park, some areas are yet to be assessed for their cultural values.

To inform the next phases of implementation, cultural values assessments will be undertaken in the areas of Royal Park North and Royal Park East.

Given comments made above under Historical sites, Royal Park West should be added to the list.

## 2 Vision, principles and themes

### 2.1 Vision

#### Draft Master Plan Vision

**Protect** Royal Park as a natural, expansive place where all people feel safe and welcome to experience its unique history and distinctive Australian landscape.

**Preserve** Royal Park as a place for nature, sport, recreation and storytelling.

**Invite** Melburnians to embrace its rich and living Wurundjeri Woi-wurrung history and cultural values.

The Friends of Royal Park and fellow Park groups have prepared an alternative Vision that we believe represents a more balanced, realistic and objective consideration of all the interests in the Park.

#### FoRP Vision

**Protect** Royal Park as a natural, expansive place that welcomes people to view and experience its unique history and distinctive Australian landscape and ecosystems.

**Invite** Melburnians and visitors to embrace its rich and living Wurundjeri Woi-wurrung history and cultural values and to walk together in recognising connections with Royal Park's land and environment.

**Preserve** Royal Park as a place for nature, recreation and storytelling.

**Encourage** use and enjoyment of the Park through balanced provision for different recreational activities, ranging from active sport to informal passive uses.

**Prioritise** Royal Park as a Dark Sky Place.

In keeping with our Vision, we make the following comments about the draft Master Plan Vision:

Use of the terms '*all people feel safe*' in the draft Master Plan is very subjective with very wide interpretations and equally wide ways of addressing. This terminology is repeated in the draft Master Plan's Principles:

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

It is agreed the park be '*welcoming*' and '*inclusive*' but unrealistic to state the park is "*inclusive for everyone*". And specific safety issues relevant to Royal Park can more objectively be addressed in the Themes sections.

The FoRP Vision removes the specific use of the word 'sport' – because it is already covered by the word 'recreation'. In the draft Master Plan under 2.4 Themes, 'recreation' is the stand-alone term used:

*3. Recreation and community wellbeing*

### 2.2 Principles

The draft Master Plan unacceptably shifts emphasis and baselines and is exemplified in the Principles.

Why is the principle:

6. *Use landscape characters present in the park to guide future planning and design.*

(a) relegated to the bottom of the list, when earlier in the draft Master Plan its importance was clearly recognised:

### **1.2 About Royal Park**

“The development of Royal Park has been strongly shaped and guided by landscape architecture master plans since 1984, where Laceworks Landscape Collaborative expressed a designed abstraction of the Australian Landscape, now synonymous with the park. The 1997 master plan by Chris Dance Land Design, reinforced and built on the 1984 principles and has excelled in leading the park through the last 27 years.

**This City of Melbourne master plan, with Traditional Owners, Wurundjeri Woi-wurrung, will respect this designed heritage and begin a new chapter in the evolution of Royal Park.”**

and

(b) why the ‘shifting baseline’ to use landscape characters currently ‘present’ in the park to guide future planning and design?

A properly informed landscape plan has not been prepared, so where is the current clearly expressed respect for the earlier master plans’ design heritage together with wider assessment and analysis yet to be conducted regarding the way forward? It is known there are issues with the ‘present’ vegetation/plantings/ tree strategy, so these should not be used to guide future planning and design.

This principle should be reworded:

7. *Respect the established landscape objectives of the earlier master plans to guide future planning and design.*

Surely the principle:

8. *Protect and grow the park for future generations.* [What is meant by ‘grow’?] would better read ‘Protect and **enhance** ...

The principle below has been addressed in Vision section above:

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

Why mandate an ‘increase’ in use?

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

The principle would stand on its own:

- *Plan for **ongoing use and enjoyment** through the provision of sport and recreation space and activities...*

### **2.3 Landscape characters**

The continuing recognition of landscape characters of Royal Park is welcomed – but would benefit reordering and amending to better present the landscape visions encountered in the Park. It would show a better understanding of the Park’s landscape character, as a visit to the Park would show.

### Landform and horizon



The earth and the sky pressed upon your view  
Glimpses of the distant city in the horizon  
The sound of the birds soaring overhead

The sound of birds soaring overhead is not the right analogy

You don't usually hear them and often they are on the ground.

Amend last statement of legend:  
[Birds flying overhead](#)

### Tree form and silhouette



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

This totally does not represent the open space bushland character that the majority of Park users have stated they most appreciate about Royal Park. No one mentions that football posts are part of the valued landscape views! Or that they link tree form and silhouette with the raucous sounds of a football game! In FoRP long experience, no footballers have ever shown an interest in the landscape character of the Park – by participating in environmental activities/plantings, etc. The football posts in the image are an anachronism and should be removed, thereby respecting the still valued original Park images.

[Amend legend accordingly.](#)

### Wind and sky



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

How is this going to equate with the proposed lighting increases in the Park?  
With 9 ovals with sports lighting, plus the SNHC, plus the tennis courts, the stars won't be visible.

Royal Park is supposed to be a Dark Place'.

A better legend?

[The clouds slowly floating away](#)

[The wind and the rustling of leaves](#)

[The skies darken and nocturnal creatures come out to play](#)

### Expansive grassland



Soft grass at your fingertips  
Following a trail left by thousands of footsteps before

Given (1) many of the grass species indigenous to Royal Park can be prickly, especially the seed heads and (2) they don't grow as a **dark** mass and (3) Royal Park was a meeting place for Aboriginal tribes coming from different directions and they were walking, carrying items, surely the legend to this image should reflect these points:

[Grasses underfoot](#)  
[Following trails of thousands of footsteps before](#)

### Water



The reflection of the sky upon the water's surface  
A sudden splash and the ripple of the water  
Who is there?

Wetlands by definition and function are often densely vegetated, so expanses of open water are not typical. If using an image of the Trin Warren Tam-boore Wetlands, modify the image to show this. And the birds don't usually suddenly splash around in the Wetlands (unless startled).

And birds aren't 'who'; they would be a 'what' ... and 'who' - a person - would be 'there' in the water or reeds??

Amend legend

[Reflection of the sky on the water in the ponds](#)  
[Rustling in the surrounding reeds](#)  
[What bird is hiding there?](#)

### Fire and smoke



The wind brings with it a haze of smoke  
the smell of ash  
The promise of new growth

Is this an image that should be included?

The recent history of fires in the Park is associated with vandalism/deliberately lit fires and destruction of habitat.

Introduction of cultural burns in the Park, has yet to be validated as their association with Traditional Owner livelihood is no longer applicable. Any use for weed control also has not been validated and awaits the preparation of a landscape and management plan for the Park. Any evidence of smoke haze, smell of smoke or fire raises alarm for the Royal Children's Hospital.



## 2.4 Themes

### 1. Celebrating Aboriginal culture and furthering self-determination

Is 'furthering self-determination' per se the role of the Royal Park Master Plan .... rather than wording as given in section:

#### 2.4.1 paragraph 1

*There is significant potential for the acknowledgement, expression and celebration of Aboriginal history, knowledge and cultural values within Royal Park.*

'Furthering self-determination' is more fully and more appropriately described in the last paragraphs of this section in the draft Master Plan.

paragraph 3 (cf paragraph 4)

This theme underpins the new master plan. All recommendations and actions must consider the Aboriginal cultural values of the place, and City of Melbourne **and community** must walk together with the Wurundjeri Woi-wurrung to deliver on actions to achieve the shared long-term aspirations for the park.

#### Aspirations

- **Applying Traditional Owner cultural objectives, knowledge and practices in the management of the park.**

Pre-European settlement Royal Park Traditional Owner practices might not always be appropriate in 2025. For example:

- ***The collection of fallen timber for cultural practice and to allow tree scarring.***

In 2025 the Park does not comprise hundred-year-old trees and extensive fallen timber/litter. The Ecology and Biodiversity report and Nature in the City Strategy both rightly suggests fallen branches and tree litter should be left on the ground to build up habitat layers. And tree scarring might do unwarranted damage to (relatively) young tree stock in the Park. Over the 20 years lifespan of the new Master Plan, there needs to be a balance between re-introducing historical cultural practices and protecting and enhancing the Park's biodiversity – a point made earlier in the draft Master Plan:

1.6 However, it is acknowledged that in some circumstances consideration will need to be given to the complex or competing values represented in the park, such as Aboriginal and non-Aboriginal heritage and significance, biodiversity and sport.

- ***Cultural burning.***

This should only be undertaken after the preparation of a comprehensive Landscape, Biodiversity & Vegetation Management Plan and finalisation of a Biolink.

- ***Planting native vegetation.***

Planting **indigenous** vegetation.

Cf. section 1.5.1, para 4



## 2.4.2 Theme 2: Caring for nature

The FoRP very much supports the following statements in the draft Master Plan:

*Previous master plans celebrated the relationship between Royal Park's prominent hilltops and ridgelines and its dominant open grassy woodland character. Specific landscape characters have been cultivated over the years since they were first identified in the 1984 master plan, through careful editing or clarification of the landscape.*

*Significant plant diversity has been restored through previous master plan actions, creating a park that balances amenity planting with open woodland, grassland and pockets of wetland. Grassland is an increasingly rare landscape in Victorian urban areas.*

*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.*

*When considering the next 20 years, engagement participants overwhelmingly expressed a desire for the park to be a beautiful, green, protected, natural space that provides an oasis and urban forest for people, plants and animals.*

.... and to do this:

*A coordinated plan that addresses the design, planting and management of all vegetation is required, including in and around sporting facilities. This will ensure the park's pre-colonial landscapes of primarily open grassy woodland are celebrated and biodiversity values are maximised, while preserving heritage plantings and landscape characters, mitigating future climate and biosecurity risks, and improving resilience.*

The draft Master Plan proposes a habitat biodiversity corridor (biolink) as part of the plan and the background document 'Royal Park Master Plan Ecology and Biodiversity' provides background information and details a proposed biolink.

See diagram below:



The FoRP does not accept the Biolink as proposed because we believe the supporting ‘Ecology and Biodiversity’ report is an incomplete and flawed document. Problems with the report include:

1. Failure to properly consult more widely with groups and people who have detailed knowledge and understanding of Royal Park as shown in erroneous findings in the report.
2. Failure to consider key databases and relevant reports for the Park compromises recommendations.
3. On-ground inspections do not appear to have been undertaken to sufficiently inform recommendations.
4. The proposed Biolink has not included important known habitat areas.
5. The proposed Biolink excludes areas proposed in the draft Master Plan for sporting field upgrades, potential expansion/development areas –
  - a. Lawn 7 area
  - b. adjoining area north of the Urban Camp
  - c. wide arc of grassland and woodland extending from the Billabong area/Elliott Ave to Nature Play/Gatehouse St
  - d. area north and west of North Park Tennis Courts
  - e. area north of the ANG
6. The map incorporated into the Ecology and Biodiversity report is therefore considered to be pre-conceived in meeting draft Master Plan proposals for more

sports ovals, activity areas, visitor facilities and future expansion/development resulting in them being excluded from the proposed biolink.

To provide more detail to the above:

1. Serco, the Council's open space contractors for Royal Park and the Friends of Royal Park, Parkville both have extensive knowledge and understanding of the park, having been involved in on-ground management and projects implementing the 1997 masterplan.

Failure to consult, for example, shows in erroneous statements regarding occurrences of indigenous species and background history regarding plantings.

2. It is inconceivable that data bases such as iNaturalist were apparently not checked. If they had been then the vulnerable and critically endangered bird species in the Park would have been identified and their habitat areas.

A key document '**Royal Park Planting Plan**' (City of Melbourne and Serco, 2007) was not referenced. It would have provided much valuable information about the planting zones and planting associations of Royal Park, mowing regimes and information that remains relevant today ... and that should be considered for any proposed biolink.

3. On-ground inspections of the current plantings would have clearly shown issues concerning vegetation: Shrub cover throughout the Park is increasingly being dominated by one species – *Rhagodia parabolica* – overwhelming and destroying original indigenous plantings; creating a monoculture in many areas; causing loss of biodiversity; not a part of the Royal Park EVC palette – being 'rare in Melbourne' (cf Flora of Melbourne). Represents a failure to address a key issue regarding vegetation proposals for a biolink.
4. Known habitat areas excluded from the proposed biolink, e.g. Swift Parrot (critically endangered) - Lawn 7 area; Little Eagle (vulnerable) – Lawn 7; Gang Gang Parrots (endangered) – Walker Oval area; Grey-headed Flying Fox - former Marconi Cres/Morton Bay Fig avenue.
5. Excluded areas from proposed biolink:
  - a. Lawn 7 area currently is known habitat for the critically endangered Swift Parrot and vulnerable Little Eagle, as mentioned above. It is a long-standing area frequented by the Park's juvenile Magpie population.
  - b. Adjacent hilltop area to north of Urban Camp – inexplicable given its clear biolinkage to Lawn 7 above, to the adjoining Brens Remnant Vegetation Site and to the Royal Park West Remnant Vegetation Site directly across the railway line. Unrealistic proposition of a miniscule pinch point wildlife crossing across the railway line.
  - c. This extensive, wide arc of parkland comprises established indigenous trees, shrubs and grassland – **typical of the Ecological Vegetation Class EVC 175 open grassy woodland that characterises the majority of Royal Park**. It is unencumbered open space, with the exception of the Flemington Rd Oval. At the western end, it adjoins the key habitat areas of the Billabong and the 'Gully' with its stands of old-growth eucalypt with tree hollows. Also towards the west, it contains the historic 'Picnic Circle' of hollow-bearing eucalypt trees. To the

north it shares a long boundary with the key Grassland Circle and adjacent areas. It has many characteristics the Ecology and Biodiversity report states are important to address the Noisy Miner problem: established trees, including Allocasuarina (i.e. non nectar trees), established shrub beds and grassland, where the grass is allowed to grow longer.

[This extensive arc of parkland is significant in size and ecological quality and a prime area that should be included in a biolink. There is no justification for its exclusion.](#)

- d. Unjustified also is the exclusion of the area north and west of the North Park Tennis Courts – given it abuts key, known habitat areas of the ‘Gully’ and the Billabong.
  - e. No reason, no justification for the exclusion of the parkland area to the north of the ANG, except for the fact that the proposed biolink has been made to fit the draft Master Plan’s proposed picnic/BBG/toilet area. But the Walmsley House, Serco depot and Caretaker’s House adjacent to the ANG have been included in the proposed biolink – despite the draft Master Plan proposing they be converted into a café and visitor centre!  
And how come the vegetation-bare triangle of land between Royal Pde and The Avenue was included in the proposed biolink?
  - f. Additional point:  
Royal Park is classified as predominantly EVC175 Open Grassy Woodland, which has a defined percentage tree canopy cover. This is also addressed in the Royal Park Planting Plan 2007. It is these tree criteria that must be applied in the Park – not the Council’s Urban Forest Strategy, which seeks blanket numbers of trees planted in the municipality per year. The new Master Plan must decouple Royal Park’s tree planting from the Parkville Urban Forest Strategy.
6. The whole of Royal Park must be considered as one biolink area and assessed following the preparation of new Landscape, Vegetation, Biodiversity and Management Plan as recommended below.

[For a properly informed biolink to be proposed, that will best guide the Park’s ecological development over the next 20 years, \*\*first\*\* must come the preparation of a comprehensive, expert, well researched \*\*Landscape, Vegetation, Biodiversity and Management Plan\*\*. This must be the outcome of a much wider consultation with people and groups whose knowledge and expertise will contribute valuable, relevant knowledge and understanding, together with further research of relevant data and reports, and in collaboration with Traditional Owners. A proposed biolink will be the outcome of the consultation and resultant expert Plan. This must be the priority item for the new Royal Park Master Plan. Any sporting or other developments proposed in the Master Plan must be subject to the findings of this Landscape, Vegetation, Biodiversity and Management Plan.](#)

### 2.4.3 Theme 3: Recreation and community wellbeing

The 1997 Royal Park Master Plan states:

- *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.*

The draft Master Plan takes away that balance, and states:

- *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]

The statement downgrades the informal, casual, spontaneous, individual passive recreation uses of the Park and promotes provision and use for sporting recreation.

This is despite the Master Plan consultation finding that:

*Informal recreation is the largest use of Royal Park, with non-structured activities including walking, running, sitting, reading, children's play, keeping fit, dog walking, having picnics, birdwatching, cycling and exploring ... [and nature therapy].*

... which are facilitated by its natural bushland setting:

*"We heard that many participants love and value the natural landscapes of Royal Park including the plants, and animals as well as big trees providing shade. Survey and pop-up participants selected or voted on these elements on over 1,700 times across multiple themes."*

Council's Nature in the City Strategy states "we need nature and nature needs us" and "There is a large and increasing body of evidence to show that time spent in natural spaces is linked to positive short and long-term health benefits" .... highlighting the importance of informal/passive recreation in Royal Park.

These findings are supported by Active Victoria reports that national trends show people are moving away from organised sport towards less structured, informal opportunities.

So, with over 40% of the Park already used for organised sport with dedicated facilities and proposals to intensify use of existing sports facilities, further proposals in the draft Master Plan to increase active sporting recreation in the Park are not justified and certainly do not maintain the balance referred to above.

So why does the draft Master Plan state:

*In line with projected population growth and increased participation, particularly from women and girls, pavilions and sporting grounds (in Royal Park) **must** be equipped to support and accommodate greater demand.*

Council, in looking to cater for increased sporting demand for future populations in the municipality, last year developed a Recreation Facilities Provision Framework ... but why **must** Royal Park take on an increased load? Surely 'should' is the operative word given

Royal Park is identified as a special park with special characteristics; where active recreation should not be mandated over passive recreation and the Park's landscape and environmental values.

Council and State Government must work together to build recreational facilities to meet future demands for sporting recreation – in Arden, Macaulay, Docklands – and to start now. Royal Park must not be sacrificed to short-term solutions.

Demands by sporting clubs for the Council to keep providing more and enhanced facilities for them in Royal Park, needs rationalising, particularly when those demands mean taking over open space used for passive recreation, the environment and biodiversity. It is time that major organisations such as the University of Melbourne provide adequate sports facilities for their student population elsewhere, and not put increasing demands on Royal Park.

In the draft Master Plan, proposals that would increase active sporting recreation in the Park include:

- creating an 'AFL' oval/rectangular field plus additional rectangular field at Lawn 7;
- creating 5 netball-sized-court 'multi-use games areas' with "netball/basketball rings, cricket practice nets, other activities" throughout the Park;
- enhancement of the upper field at Manningham St for "increased exercise";
- additional tennis court at North Park Tennis Courts;
- mini golf course;
- disc golf course.

The outcome of these proposals would be excision of parkland, threat to environmental values of the Park - habitat and biodiversity - and amenity. The draft Royal Park Master Plan's active sport proposals take away a significant amount of Royal Park open space parkland and compromise biodiversity and habitat - nothing is given in return.

Our opposition to the above sporting facilities inserted into the Park's valued open space setting, is detailed below:

- Lawn 7 is the last free open space for informal sport and recreation in Royal Park. With 14 dedicated sports fields already in the Park, this last remaining space must not be taken away – enlarged, levelled, cleared to accommodate an 'AFL' oval and rectangular (soccer) fields.

An AFL/Australian Rules Football oval requires an average 22,275 sqm; a soccer field requires a minimum of 7140sqm. Thus 29,415 sqm would be required to fit the proposed AFL oval and soccer field. It is estimated that Lawn 7 open space provides 18,470 sqm.

**To provide the required 29,415 sqm, would mean excision of another 11,000 of the surrounding parkland and existing trees. Provision of associated facilities, including a pavilion, would mean yet more parkland is levelled and excised!**

**The Lawn 7 area is a known habitat area for the 'critically endangered' Swift Parrot.** Creating sports oval/fields, with mown turf, herbicide use, built facilities, levelling, clearance of trees and parkland and intensification of use by organised

sporting groups will destroy this Swift Parrot habitat and the long-established gathering place for the Park's juvenile Magpies. Compaction of the ground, underground structures and chemical use will reduce soil health and in turn, biodiversity and ecosystem health, by reducing soil biota and other key factors.

It is totally irresponsible for Council to excise this last free informal recreation space of Royal Park, when Council should be planning, together with the State Government, sports facilities to cater for the increasing populations already occurring in Kensington, North Melbourne, Arden, Macaulay, Docklands.

- **Five 'multi-use games areas'**. These will be for non-organised, spontaneous sport. They will be built infrastructure. They could include "*net/basketball rings, practice cricket nets, 'other activities'*". They would be "*approximately the size of a netball court*" (FMC Meeting 4 Feb) - which is 30.5m x 15.25m. At 500 sqm each, a total of 2500 sqm would be excised from parkland for these built facilities. They would necessarily be hard surfaced, likely synthetic, given the nature of the activities proposed and likely have lighting for extended use during winter and at night. They would be akin to adding more car parks to the Park.

The FoRP does not see the need for these netball-sized games areas throughout the Park. From a single comment in the consultations, one suggestion for a ½ basketball court has morphed into five multi-use games areas throughout the Park! From observation, such facilities are best located and used when close to residential hubs, not set in more distant parkland. Sharing nearby school and community facilities should be options, when considering provision of active recreation facilities in the wider area.

One 'multi-use games area' is suggested for each precinct with three locations named:

- o Royal Park North combined with a neighbourhood nature-based play space built on reclaimed parking area.
- o Royal Park East in reclaimed road space of The Avenue.
- o Royal Park South at the Flemington Road Oval. The multi-use games area at this location is questioned, given such facilities are available at the nearby Errol St primary school campuses/other local schools which are in closer proximity to the residential area.

For the other two precincts:

- o Royal Park West precinct is small, its open space amenity is high and importantly, it hosts the significant Wetlands, Skink Habitat Site and Remnant Vegetation Site. Excising 500sqm from this area and constructing a multi-use games area is environmental responsibility gone mad. How does that meet the Master Plan purpose: "*provide a biodiverse sanctuary for native flora and fauna*" and Master Plan principle: "*protect and enhance biodiversity values in the park*"? It demonstrates Council's inability to think outside Royal Park – it is known that Parkville Gardens would be keen for recreational facilities for older children and teenagers to be provided there. Then there is nearby Djerring Flemington/Debney Park with its new multi-use games areas.



It is our observation that multi-use games areas are predominantly used by locals - older children, teenagers, young adults - and are located close to residential hubs.

- Royal Park Central precinct does not fit this scenario; two large facilities occupy much of the precinct - the Zoo and SNHC - and importantly, the precinct includes key habitat, biolink and special Wurundjeri areas.

And as stated above, Parkville Gardens is an alternative location for a multi-use games area, instead of Royal Park.

- **Additional tennis court** at North Park Tennis Courts. Because of existing underground services (storm water drainage, gas), a fourth tennis court would be built to the north of the existing 3 courts. This is totally opposed because it would take away most what is a very pleasant neighbourhood space – with picnic/BBQ and good amenity .... and leave a narrow laneway of residual, open space with no amenity. The additional court would further detrimentally impact on the adjoining significant habitat and biodiversity of the ‘Gully’ – with its stands of old growth habitat trees and understorey plantings – and on the adjacent Billabong. The detrimental impacts include extensive light spill from the unbaffled court lighting and fact that the courts are (over)used 18/7. North Park Tennis Club is a private organisation; why should Royal Park’s valued public parkland be given to them for free for an additional court when, instead, the Club should be providing their own facilities off-Park.
- **Mini golf course.** It is understood that this is a commercial proposal, not supported by the golf club. It is expected lighting would be installed to prolong play. But the golf course has been designated as an important ‘dark space’, part of the biolink.
- **Disc golf** is proposed for Royal Park Central. Where? In the biolink areas of the former Nursery Site or area south of Lawn 7? Lawn 7 area itself? the Wurundjeri ‘knowledge place’? or the ‘Hilltop’ area? All are totally inappropriate for this dangerous sport whereby frisbees are flung around trees, shrubs, aiming for sight-unseen 1.5m high fixed baskets .... disc golf websites state *“wooded areas, rolling hills, creeks, and ponds can all be aesthetically pleasing for a great course.”* A course encompasses 9-18 ‘holes’ over 5-15 hectares. Disc golf is for informal use at any time by individuals or groups and for organised competitions. The 3-month trial in Royal Park in 2022 saw people nearly hit; abusive comment and threatening behaviour from players and competitors; wear tracks created in parkland between baskets and tees; damage to vegetation/ intrusion into the Billabong. Disc golf alienates parkland for others because of the danger and perceived danger - informal walkers/park users avoid areas where disc golf is played; it is a public safety risk. Disc golf must be considered as a formal sport involving fixed infrastructure. Just as football, cricket, golf, etc. are played in dedicated facilities, so should disc golf. Adding another dedicated sports facility with a large footprint in Royal Park is not supported. Allowing disc golf as a recreational sport in Royal Park is strongly opposed.

– **Expansion of Nature Play**

The draft Master Plan proposes an expansion - double the size of the existing Nature Play area in Royal Park South - to enable older children and teenagers to “play and explore the park”.

No details are provided as to what play or exploration activities might comprise, except for a Council officer comment that they could just wander around the bushland! Those with knowledge of older children and teenagers suggest that provision of structured play is what best suits this cohort. And consultation suggestions for ‘fun activities for children’ included waterslide, climbing frame, rock climbing, large slides, skate park. In an expanded Nature Play, such built structures would excise more parkland and destroy established vegetation.

## 2.4.4 Theme 4: Visitor experience

### Aspirations

- Explore ways to ensure the visitor experience is enhanced by education and interpretation facilities, events and activities that complement the park's sensitive landscape.

In Royal Park South, Action 15, it is suggested converting the Walmsley House and The Lodge/Caretaker's House to café and visitor centre. The Walmsley House is on the Heritage Victoria Register. On historic and structural grounds it is totally unsuited for conversion to a café; also it is an important Park management facility and community meeting place. A Park depot and nursery adjoin the Walmsley House; their function would be compromised by any loss of use of the Walmsley House. With a café, would come associated kitchen, waste, service, parking requirements compromising the building's heritage. Also such facilities encourage outdoor use ... compromising highly recognised amenity of the Australian Native Garden. Use of The Lodge/Caretaker's House is likely not feasible due to difficult access to the Park and proximity of the significant large Golden Elm (on National Trust Significant Tree Register). Conversion of the Walmsley House and The Lodge are not supported.

### Add:

- Ensure all venues and facilities are designed to meet relevant standards and demonstrate design excellence, [including environmental sustainability](#).

### Clarify:

- Continually improve data collection to understand visitation and usage.

Current concrete blocks and poles inserted in the Park landscape for data collection are unsightly and should be removed. Any measures for data collection should avoid use of such intrusive physical structures.

### Lighting

The draft Master Plan proposes to increase lighting in the Park in two main ways:

- increased lighting associated with intensification and increased use of sporting facilities, allowing longer hours of use in winter and more night time use.
- increased lighting of paths and movement through the Park.

The Friends of Royal Park opposes the intensification and increased use of sporting facilities in the Park because the increases in lighting of ovals and associated facilities, including access paths and roads and pavilions, will cause a consequent increase in artificial light at night (ALAN) - detrimentally impacting on the Park's nocturnal fauna and biodiversity.

According to the National Light Pollution Guidelines, **artificial light at night (ALAN)** is now recognised as a significant environmental pollutant, that affects individual organisms (through its impact on immune function, reproduction, development, behaviour, and feeding) through to entire ecological communities (due to reduced connectivity, disrupted food webs, loss of pollination or other ecosystem function, and reduced biodiversity). The Council's Nature in the City Strategy identifies ALAN as a threat to both biodiversity and human health and wellbeing that will be identified and reduced.

The proposed increases in lighting and ALAN will come from:

- increase in number of ovals with sports lighting from 6 to 9, a 50% increase, or more if Walker Oval's east and west ovals are counted separately with more extensive lighting;
- increase in number of hours for night time and winter use of sports ovals;
- increase in lighting of facilities and infrastructure associated with sport: pavilions, access paths, car parks and roadways;
- increase in the number of tennis courts (from 3 to 4) at North Park Tennis Club; all courts are floodlit;
- increase in lighting of paths and roads in the Park;
- any lighting associated with the 5 proposed multi-use games areas;
- failure to more precisely specify lighting parameters that would minimise ALAN impacts;
- inadequate technological mechanisms for control of lighting;
- poor contract conditions; lack of responsibility by facility users and ineffective management.

In proposing lighting in the Park - Figure 8 in the draft Master Plan - it is pertinent to mention statements from the expert report "Wildlife Sensitive Lighting" by Dr. Marty Lockett and Assoc. Professor Therésa Jones (2022) ( Appendix B in the 'Royal Park Master Plan Ecology and Biodiversity Report' background document.)

- *Lighting can mean an area is wrongly perceived as safe or appropriate to use at night and more isolated paths may be less safe for users late at night, regardless of lighting.* In the draft Master Plan such paths would include sections of circuit paths, the transverse path above Nature Play, even the path around the rear wall of the Zoo and through relatively long sections of isolated parkland and rear of the RCH.
- *Bushland and wetland reserves – the ecological value of habitat for wildlife (such as nocturnal birds, bats, arboreal mammals and frogs) may be reduced if these areas are frequently used after dark.* Such examples in the draft Master Plan would be the circuit path around Walker/Smith/Brens Ovals and link from Brens Drive to the so-called Gully habitat area south of Elliott Ave exposing it to increased use.

It is also pertinent make reference to the Merri Creek XYZ Lab Safety Report:  
<https://conversations.merri-bek.vic.gov.au/making-merri-creek-safe>

- Respondents were caution that too many or particular infrastructure additions and changes to improve safety could too easily be intrusive and destroy the natural qualities of the area.
- 40% of survey respondents said that more lighting would still not increase their night-time usage.

### 1. Specific comments in relation to the points above regarding sports lighting:

- **No play, no lights**

For sports oval lighting in the draft Master Plan it is stated: *...ensure lights are off outside official hours of operation.* This is a meaningless measure. Council's **Lighting Strategy 2021** under section 4.5.8 **Treat Royal Park as a 'dark place'** states:

- Sports facilities in Royal Park should be lit only when activities are occurring and must be turned off at 10pm.

Elsewhere in the draft Master Plan document, “sports lighting (until 10pm)” is often used. This weak control means sports lighting can be operating until 10pm – regardless of any activity on the ground. And indeed this is the case – many ovals in Royal Park on many occasions have been observed with the floodlights blazing until 10pm with no on-ground activity, no people around or in nearby pavilions (cf FoRP correspondence to CoM CEO 4/8/24). Tennis courts are also transgressors (cf FoRP correspondence of 14/2/25)

Inexplicable too is the non-compliance of the North Park Tennis Club with the 10pm Lighting Strategy cut-off and play is currently allowed, and advertised, on the Club’s website, until 11pm. Council management must provide an explanation for the non-compliance with lighting strategies and failure to enforce the 10pm regulation; unacceptable precedents cannot be set.

The Lighting control in the new Master Plan must be:

Sports ovals and tennis courts in Royal Park must only be lit when on-ground play is taking place. Associated facilities: pavilions, car parks, access ways and paths must have lighting turned off when use of the sport facility has ceased; no activity can continue beyond 10pm.

The access road to the new Ryder Pavilion; the access drive to the Ross Straw Pavilion; the access road to the Brens Pavilion and circuit paths around its associated ovals would be part of the above control.

- **Lighting specifications**

In proposing upgrades to sports facilities, the draft Master Plan states lighting must comply with “all Australian standards”, however, assessment and specifications should take into account the large number of relevant, detailed points made by Dr. Marty Lockett and Assoc. Professor Therésa Jones in their comprehensive, expert report “Wildlife Sensitive Lighting” (2022), Appendix B in the ‘Royal Park Master Plan Ecology and Biodiversity Report’ background document. For example, quoting the report –

*“Australian Standards are only guidelines that have no stated maximum, and there are sometimes good reasons to depart from a particular standard to improve wildlife outcomes (indeed, the standards themselves allow for this).”*

- **Inadequate controls**

The draft Master Plan recommends sports lighting must “include control features, such as automation and sensors”. This is not good enough! Currently, ‘automation’ would appear to be to set lights to automatically operate according to the original booking times made for the season, with no adaptation for subsequent changes, no remote monitoring of actual use or technical ability to over-ride. In this day of sophisticated electronic systems, this is totally unacceptable. [Not to mention totally irresponsible energy use – a failure to meet another Council Lighting Strategy guideline 7.2 - Glowing greener.]

Much tighter, effective controls must be specified – as set out in the above Lockett/Jones report and in Appendix C of the Royal Park Master Plan Ecology and Biodiversity Report.

- **Ineffective management**

Exacerbating the above is the Council's inability to properly manage sports oval lighting in the Park and weakness in the draft Master Plan in addressing.

The draft Master Plan must include under 3. Sport lighting - that contracts for sports facility seasonal or casual use must mandate measures for minimisation of the impacts of ALAN on the Park's fauna and biodiversity, as well as responsible energy use.

Management procedures must be strengthened to effectively monitor, enforce and audit lighting at sports facilities.

## 2. **Specific comments in relation to lighting of other roads and paths in the Park: strategic movement corridors, destinations and connections:**

- **Strategic movement corridors**

We do not support lighting the Capital City Trail (CCT) shared path southwest of the Royal Park Station/Poplar Rd intersection as it runs past significant habitat sites (Skink Habitat Site; Royal Park West Remnant Vegetation Site ... designated 'dark places'). At night this path is not used by pedestrians; cyclists are required to have lights, so there would not be conflict between cyclists and pedestrians.

The CCT northeast of the Station/Poplar Road has existing remote sensing/dimmable lighting and this could be continued northwards.

We do not support lighting the shared path along the tram line except for one section between the northern entrance of the Zoo and the SNHC crossing. The draft Master Plan proposes "*to construct lighting along the tram line to support year-round walking, running, cycling and public transport access*". The tramline path extends around 2.5km through the Park and participants in the Council's Community Audit and Refresh consultations expressed personal safety concerns that would be relevant to this path at night: about being observed from trams; being close to tram stops; being confined by the Zoo wall; being in dark areas and bikes travelling at speed. Re dark areas: the northern section of the path bisects the golf course, with 500m 'indicative area of darkness' as part of the Biolink. To the south, the path passes through an isolated section of the Park with 400m of 'indicative area of darkness'.

Lockett and Jones state that lighting can mean an area is wrongly perceived as safe or appropriate to use at night and more isolated paths may be less safe for users late at night, regardless of lighting.

Given the concerns expressed above and that the main use of the path would likely be a daytime recreational one (not one servicing the RCH 'staff' car park (currently free) at the SNHC), it does not need to have lighting installed.

- **Key connections**

The FoRP supports the optimisation of lighting along the key roads: Poplar Rd, Elliott Ave, in front of the Zoo, to support pedestrians and biodiversity and calls for the exploration of mechanisms whereby Australian standards and relevant guidelines can be adapted to limit negative ALAN impacts (Cf the Lockett and Jones report (section 6.4, Appendix B of the Royal Park Master Plan Ecology and Biodiversity Report.)

- **Destination lighting**

Lighting along internal roads - Brens Drive and Old Poplar Rd - should be modified as per the recommendations in the Ecology and Biodiversity Report Appendix C:

- *Converting the current lighting in Brens Drive to 3000k (or lower) and ensuring it is adaptive dimmable sensor lighting and applying lighting curfews and reductions.*

Lighting along the access drive to Brens Pavilion should similarly be modified.

Existing lighting of the access roadway into Ross Straw Pavilion must be removed.

The road directly abuts the significant Royal Park West Remnant Site, the protection of its ecological values must take priority. There is no need to light the access roadway into the Pavilion. Locked bollards prevent use when no sport is being played on the ovals. Sports played on the Manningham Reserve ovals include baseball and cricket – both daytime games. There is no lighting of the ovals. So lighting the roadway is not needed.

- **Other paths**

There are two paths that aren't destination paths, key connections or strategic movement paths and it is questioned why they should be lit: the pedestrian path between Walker St and Macarthur Rd/parallel to Elliott Avenue (Zoo section) and the transverse path from Gatehouse St to former tram stop #23.

There is no need for lighting the pedestrian path that runs to the east of Elliott Avenue (Zoo section) because it can share the street lighting of Elliott Ave. This would be in keeping with the suggested strategy in the Lockett and Jones background report on lighting that:

*Pedestrian/shared paths close to roads allows users to benefit from the road lighting while eliminating the need to install additional path lighting.*

And it is noted that there is already a lighted path on the western side of Elliott Ave, alongside the Zoo perimeter wall, so another reason for not lighting the park path.

The transverse path from Gatehouse St has no destination, connection or strategic purpose. Where are people going to? The path passes along a long section of 'indicative area of darkness', part of the extensive Biolink around the Grassland Circle. In the CoM Royal Park Safety Audit Findings Report, it was recommended:

*2. avoiding lighting in the pathway that goes towards 'the circle'*

and it was Gatehouse Street itself that improved street lighting was called for. Why would people want to walk this path at night, when the safer, well-lit Flemington Road footpath is close by? The proposed lighting of the path has no justification and should be deleted.

- **Lighting of circuit paths**

Five circuit paths are proposed in the draft Master Plan. Two circuits are proposed to include lighting: one abuts the golf course 'an indicative area of darkness' to protect biodiversity; the other impacts on the known habitat area near Walker Oval. In the latter case, existing street lighting in The Avenue, Macarthur Rd and Elliott Avenue already provide lighting, so any further lighting would be unwarranted. In opposing the creation of paved 'donut' circuit paths for "uninterrupted exercising" in the Park, the FoRP also opposes the lighting of the circuits.



### **3. Additional comments regarding other sources of lighting**

The SNHC and the former CSL site are major lighting generators, with significant negative impacts on the Park's status as a 'dark place' and environmental parameters such as biodiversity. The Master Plan must build into the Lighting Policy (see below) measures to work in co-operation with these organisations to mitigate the lighting impacts of their buildings and car parks.

There can be no confidence that the Master Plan's objective to protect and enhance the Park's wildlife and biodiversity would be met with the current provisos in the draft Plan relating to lighting unless a comprehensive, expert **Lighting Policy for Royal Park** is prepared, establishing standards and specifications, assessment procedures, introducing effective technical controls and effective Council management.

The policy should build on the expert report of Lockett and Jones (Appendix B) and specific recommendations (Appendix C) in the Ecology and Biodiversity Report and be developed with wider consultation. **Lighting is such an important factor in protecting Royal Park's ecosystems and biodiversity that a stand-alone Royal Park Lighting Policy must be a priority item in the new Master Plan.** Lighting in Royal Park should not be left to generalist statements in the Master Plan or to an appendix in a background document or referral to less specific documents (Public Lighting Strategy, Nature in the City, etc.) Having a **Lighting Policy for Royal Park** will allow for the proper and responsible assessment of proposals involving lighting in the implementation of the Master Plan.

## 2.4.5 Theme 5: Movement to and through the park

### Aspirations

- *Expand the network of paths to improve circulation.*

This is not correct. The Community Audit and Refresh consultations overwhelmingly referred to improving 'connections' – i.e. access to pavilions, connections to public transport, etc.

### Path types

#### 'Shared paths'

Why haven't shared paths per se been acknowledged in the draft Master Plan as an important part of Royal Park. And the important issues associated with them? There is an extensive system of shared paths throughout the Park. Council's transport strategy has a map of the shared cycle and pedestrian paths in the Park. They include strategic movement routes and connector paths.

#### 1. Strategic movement corridors

Why are the CCT, Upfield Trail and tramline shared paths called "commuter" routes. The 'commuting' is predominantly by cyclists. The many comments in the community consultations highlighted the dangerous situation caused by commuting and recreational fast riding cyclists on what are designated **shared paths**. The draft Master Plan makes little attempt to address the dangerous conflict/safety issues of the CCT, Upfield and tramline paths.

To merely state:

*However, where there are congestion issues, consideration must be given to separate pedestrians from other modes of active transport such as bicycles and scooters.*

is not good enough. It is not just 'congestion'; it is the dangerous, fast riding, often with no lights, cyclists who pose a safety risk to pedestrians on the shared paths.

Separation of the paths should be part of the Master Plan, so that on Figure 10 the CCT, Upfield and tramline paths are duplicated with separate cyclists' paths ... or cyclists routed onto roadways instead. The FoRP has previously made known its concerns about the CCT and subsequently installed measures by Council are ineffective.

The draft Master Plan makes no mention about installing physical measures to slow speeding cyclists down or enforcement measures. If the Park is to be "*a safe and welcoming place for all*", then failing to address this issue is a gross failure of the draft Master Plan.

#### 2. Connector paths

It is assumed that all the dashed paths shown on Figure 10 as 'Proposed path (pedestrian and/or cycling)' are 'connector' paths. It is stated they will be 2.5m wide asphalt.

No justification has been provided for these paths, through numbers, through specific consultation questions/answers. No recognition of important biodiversity parameters where the connector paths are proposed or where they coincide with 'circuit paths'. No recognition that forming paths through sensitive areas creates fragmentation, disrupts faunal passage, alienates natural parkland - replaced by wildlife-unfriendly paved surfaces requiring ongoing maintenance (herbicide, surface repair). No recognition that in creating

paths including cycling increases conflict with walkers, increases pedestrian safety risk and decreases passive enjoyment.

The FoRP's understanding of Royal Park's ecological and amenity values leads to our opposition to the following proposed formal paths:

- Paths bisecting the Grassland Circle, known habitat area for two species of quail.
- Paths around the significant biodiversity area - Brens Remnant Vegetation Site
- Path through Lawn 7 – unnecessary ill-informed construction. Observation shows that is not where people informally walk through the area. Certainly not associated with Urban Camp or SNHC access.
- Paths along the Royal Park creek, which has steep sides, would necessitate safety fences and construction of bridges across the main creek or tributary. Also the creek corridor is subject to Aboriginal Cultural Heritage permit requirements.
- Unnecessary formal path along The Avenue between Macarthur Rd and Walker St, when there is already an informal path.
- Diagonal short-cut path through the golf course, when there is a proposed path close by along The Avenue.
- Formalising the existing diagonal informal path linking asphalt paths: Flemington Rd (opposite Dryburgh St) to #58 tramline; Flemington Rd (opposite Melrose St) to #58 tramline. This will create a cyclist rat-run allowing cyclists to speed down the slope, threatening walkers; a totally irresponsible proposal as far as safety and amenity of pedestrians is concerned.
- Pedestrian/cycle path from CCT conflict as sited through upper Manningham Reserve field and proposed biolink wildlife crossing.

Correction is required to Figure 10. There is no formal paved path along the Flemington Rd frontage between the park entry point opposite Melrose St and the entry point opposite Dryburgh St. This is an informal park track. It does not need paving as the Flemington Rd footpath is just a few metres away.

### **3. Circuits**

The circuit paths would have a “*generous width of up to 2.5m*” and paved. Some would have lighting. They would be used for “*uninterrupted exercise*”, for “*walking, running, birdwatching*”. They would provide a “connector” function between *key destinations and community infrastructure* (sports facilities, pavilions) ... but this function is already catered for by the designated Connector paths.

The FoRP does not know where the idea of circuit paths has come from. In the Council's Refresh consultation findings, not once is provision of circuits mentioned (bar one where parents wanted to watch their kids on the oval, whilst walking around the oval). The consultation data showed that people wanted paths to “improve connections”, that provided “access to and from” facilities and public transport, NOT circuits around them. People had safety concerns about visiting certain areas, such as sports facilities (ovals, fields, golf course) and infrastructure ... so why build circuit paths around them?

It is well known that joggers like longer, destination runs, not “boring” short circuits around ovals in the midst 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 necessarily ‘corralled’ by infrastructure such as formal paths ... walking on grassland, informal tracks, meanders, sometimes dirt or gravel. And listening to the sounds of nature, not raucous voices of sport close by.

Approx 2 km of existing grassed parkland would be lost from the Park’s natural landscape by excision for new constructed surfaced circuit paths, i.e. a loss of biodiversity; adding to heat island effect and loss of spontaneity in walking around the Park. The draft Master Plan suggests the majority would be ‘granitic sand’, however granitic sand paths are constructed with hard packed bases and edging.

It is totally environmentally irresponsible to propose a 2km circuit path/jogging/‘uninterrupted exercise’ track around the Wetlands, Skink Habitat and Remnant Vegetation Area, compromising the quiet conditions for birds and other wildlife; compromising significant vegetation, compromising habitat and biodiversity ... not to mention compromising safety through dangerous conflict with cyclists on the CCT.

A proposed circuit around Lawn 7 would be extremely detrimental to the bird population: this area is a known habitat of the critically endangered Swift Parrot and the Little Eagle, as well as an established gathering place for the Park’s juvenile Magpies.

A circuit around Walker Oval would threaten this known habitat of Gang Gang Cockatoos. A lighted path extending around the avenue of Morton Bay figs would adversely affect the Grey-headed Flying Foxes, as these trees are a significant habitat and food source for the bats.

The FoRP opposes the formation of the circuit paths, all five of them, in Royal Park.

#### **4. Exploration trails**

This misnaming shows a total misunderstanding of what are informal paths and tracks through the Park; they are not always ‘exploration trails’. And why should they be made into ‘constructed’ paths:

*These ‘light touch’ paths can be made with a wide variety of materials, while considering the ecological values and tree protection zones of the surrounding landscape.*

The many informal paths in the Park are ephemeral and define what people love about the park – its natural bushland setting, open space where they can wander at leisure, spontaneously without an ‘exploration’ mission, without being confined to formalised paths or tracks ... they are often tracks across parkland, winding dirt tracks, changing, just enjoying walking in the Park. They do not need to be formalised/to be “made”. If the informal tracks are deemed to be an issue for surrounding vegetation or other features or safety, then that is the role of the Council’s open space contractors to address ... as they have always been.

#### **5. Bicycle short cuts**

The FoRP would like to add another ‘path type’ – unwanted, unjustified paths created by cyclists short-cutting through parkland, instead of using the designated, asphalt bicycle network (see Transport Strategy 2030 diagram below). The draft Master Plan has not

addressed this and other cycling issues despite environmental degradation of the Park, impact on pedestrian safety and biodiversity.

Cyclists short cut across parkland to avoid slightly longer routes via the formed asphalt path network; or to cut a corner, saving only seconds in time, creating narrow deep hardened ruts in parkland. They are of potential danger to walkers because of the narrowness and deepness, potentially ankle-breaking.

There is no justification for the short-cutting. There are sufficient existing asphalt paths in the Park, part of the bicycle network, providing strategic movement and connector routes. Bicycles do not need to be using informal paths and tracks through parkland – they are not admiring the scenery, they are concentrating on their riding, getting from A to B.



**Royal Park Bicycle Network  
Transport Strategy 2030**

#### Examples of short-cutting bicycle tracks in the Park



The FoRP recommends that bicycles are prohibited from riding through parkland or on informal paths or tracks. They must only ride on the asphalt paths. This includes all bikes, electric bikes, mountain bikes, trail bikes, commercial bikes and scooters. The draft Master

Plan has abrogated a duty of care to protect Royal Park's parkland from this form of vehicular damage.

Given the many shared paths in what is a **park**, the draft Royal Park Master Plan fails to address cyclist behaviour by recommending compliance with basic cycling rules: speed limits, giving way to pedestrians, ringing bell, path signage ... Victoria Walks sets out parameters that the new Master Plan should adopt for Royal Park ([https://www.victoriawalks.org.au/walking\\_strategies/](https://www.victoriawalks.org.au/walking_strategies/)).

### **Crossings**

Figure 10 sets out a number of proposed crossings connecting separate sections of the Park. It has not been made clear what kind of crossings they would be: simple painted markings on the road; with flashing lights; with electronic signals? Whether VicRoads permission is necessary.

The FoRP supports:

- an underpass under the railway line between the former Nursery site and Royal Park west.
- formalising the 'popular' pedestrian crossing at the intersection of Elliott Ave and Macarthur Rd. This has clear sight lines for traffic; traffic islands to slow traffic, room for a pedestrian refuge.
- the existing signalised crossing at #58 tram/Elliott Ave intersection

We do not support:

- the proposed crossing to the Brens Pavilion access drive. Observation shows this is a heavily trafficked narrow section of road with few breaks in traffic – a potentially dangerous crossing point. And when the access drive is moved to The Avenue, this crossing will lead nowhere on the northern side.
- the crossing at Macarthur Ave/The Avenue because it is close to fully signalised Royal Pde and may not be justified in numbers and VicRoads likely to refuse.
- the crossing at the Brens Drive traffic signals as it is not justified, given the nearby safe crossing at Flemington Rd and the pedestrian generators: Urban Camp and SNHC do not use Brens Drive for access; they use the asphalt path alongside the Brens Remnant Site or paths to the north of the SNHC.
- the crossing over the railway line from Poplar Oval to Ryder Oval until such time the design of the LXR over Park St is known. The FoRP opposes elevation rises in the LXR structure to accommodate a park crossing.

Crossings that have not been, but should be addressed are those across Flemington Rd at Curran/Dryburgh St and at Melrose St in North Melbourne. The crossing at Abbotsford St is ranked poor – dangerous, difficult, multi-phase, too many conflicts – 0/10 as a 'primary' pedestrian entry point for the Park. The Master Plan could address these under 2.4.6 Theme 6: Parking, roads and transport.

## 2.4.6 Theme 6: Parking, roads and transport

### Aspirations

- **Support safe and equitable access for all transport modes.**
  - FoRP supports improved pedestrian crossings across Flemington Rd (cf 3.2.4 Royal Park South Action 24)
- **Increase use of public transport to and from the park.**
  - The FoRP supports proactive action on the part of Council to address the Royal Park railway station/tram crossing/Poplar Rd/shared paths intersection and advance the upgrade supported by the Royal Park Stakeholders Network Group (cf 3.2.3 Royal Park Central, Action 21).
  - The new Master Plan must include proactive action on the part of Council to work with the Zoo and Melbourne Sports Centre to encourage public transport use to their facilities.
- **Minimise the impact of transport infrastructure within the park.**
  - **LXRP**

The design of the LXRP must not include any increased elevation in the structure to accommodate a park crossing of the railway cutting (cf Figs 8, 11). Council should work to achieve this (cf 3.2.1 Royal Park North, Action 19).

The LXRP must not cause removal of existing Park trees: (1) the old-growth eucalypts environs McAlister Oval; (2) trees along the railway corridor towards Royal Park station.

Light and noise emissions associated with the LXRP must be minimised in keeping with the Park's biodiversity and amenity.
  - **East West Link**

The FoRP reiterates its total opposition to the East West Link because of the irreparable trashing of Royal Park that would occur.
- **Ensure car parking provision and management will support the principles of the master plan.**
  - Rationalisation of parking at the Zoo and SNHC to reduce private vehicle use and encourage public transport use must be part of the new Master Plan.
  - Removal of 'overflow parking areas' is supported as they have no environmental sustainability and end up being paved (cf 3.2.3 Royal Park Central, Action 25).
  - Increasing parking fees to realistic levels must be considered to cover maintenance costs and park improvement (a 'park contributions levy') (cf 3.2.3 Royal Park Central, Action 23).
  - Parking in Royal Park is for park users. Effective measures must be installed to prevent commuter/non-park use in all parking areas, including the Zoo and SNHC as well as closing off car parking areas associated with sports facilities when not in use.
  - Management of car parking must be made more efficient under the new Master Plan. It currently is a low-ranked priority assigned to Park Rangers. There is no enforcement of No Standing zones.
  - Lighting of car parks must only be until 10pm or earlier if play ceases. Lighting should follow guidelines developed in the proposed Lighting Strategy as we have proposed under 2.4.3 above.

- The FoRP opposes increased parking provision in association with any increased provision or use of sporting facilities.  
This includes proposed Action 17, Royal Park West. The recent installation of tree reserves, with exact multiples of car spaces between them appears intentional – as shown by use during sport activities and it is unacceptable there is no enforcement of the No Standing. There is also disregard of the bollards along the access road to the Ross Straw pavilion, with vehicles driven around them, over grassed parkland, to access parking.

- **Ensure transport infrastructure construction works will not take space from ovals, occupy recreation facilities or detrimentally impact everyday park use.**

- Add to this: [or detrimentally impact on parkland or sensitive habitat/biodiversity areas.](#)



### 3.3 Governance

#### Proposed governance actions

1. Establish a framework for prioritisation and decision-making and to inform the development of an implementation plan for the master plan.

**Priority actions** must include the preparation of a **Landscape, Vegetation, Biodiversity Management Plan** and a **Royal Park Lighting Policy**

### 3.4 Management

#### *Science and conservation*

Add:

**Develop and implement, following wider, more comprehensive, expert consultation, a Landscape, Vegetation, Biodiversity and Management Plan for Royal Park – as set out in our comments under 2.4.2 Caring for Nature**

Add:

**Develop an expert comprehensive Lighting Policy for Royal Park so as to protect its ecological systems and biodiversity.**

#### *Landscape and horticultural management*

Add:

**Develop and implement, following wider, more comprehensive, expert consultation, a Landscape, Vegetation, Biodiversity and Management Plan for Royal Park – as set out in our comments under 2.4.2 Caring for Nature**

Add:

Continue to ensure the protection and enhancement of the Park's ecological systems and biodiversity in keeping with the master plan.

Reword:

10 Continue to ensure **horticulture management** is consistent with the master plan.  
[delete 'and tree' – see comment 2.4.2 Caring for Nature (point f, page 17) above.]

#### *Visitor experience*

17 & 18 These downplay the importance of the Park's open space and passive recreation use and enjoyment – which was identified in the consultations as being the most important by park users. Again 'sport' is unjustifiably preferenced and no mention of *passive recreation*.

Add:

**Promote and enhance the natural environment of the park for informal passive recreation, health and well-being.**

#### *Sport, recreation and wellbeing*

Given the major users of the Park, use it for informal passive recreation, this section again shows the bias of the master plan planners to promote the active sporting uses in Royal Park. There is no justification for this and the **priority item** must be:

**24 Continue to promote and enhance opportunities in the park for the community to enjoy it for informal, passive recreation for their health and well-being.**

26 Develop opportunities for the wider community to access [the park and](#) facilities. It is not only 'facilities' that the community wishes to access. Most community members want to enjoy it for nature's sake!

#### *Assets and facilities*

27 Continue to ensure facilities are safe, [clean](#), efficient and environmentally sustainable.  
&

28 Continue to ensure facilities have the appropriate lease or license agreement consistent with [responsible](#) use and activity.

Currently, there is unsatisfactory use of facilities – sports pavilions – that are not kept clean and tidy by the sporting groups who use/lease them. And should use until 4am with loud 'dance music' be permitted under lease agreements – as has recently occurred?

29. Continue to deliver [effective and sustainable](#) asset management strategies, [with regular auditing and reporting](#).

## **4 Implementation and next steps**

### **4.1 Implementation**

The implementation plan to be developed after the master plan is approved will set out a sustainable program of delivery over time.

It is critical that a Royal Park Master Plan Implementation Advisory Committee be set up to oversee the implementation of the Master Plan. Membership would include representatives of Council and contractor open space management for the Park; community representatives, such as Friends groups; Royal Park Stakeholder Network Group representatives; Wurundjeri representatives; representatives from research organisations; etc. It is imperative that a wider body, with relevant expertise in a wider range of relevant matters implement the Master Plan. Implementation relegated to Council's selected, closed Parks Advisory Committee, which does not comprise the range of expertise required, is not supported.

oOo

Kaye Oddie  
Secretary  
Friends of Royal Park, Parkville Inc

