

Wattle Park, 1012 Riversdale Road Burwood (VHR H0904)

Permit P34848 for construction of new playscape, picnic area upgrade works, resurfacing and extension of existing running/walking track, establishment of Easy Ride Route, and installation of new lighting and signage.

Submissions close on Tuesday 1 March.

<https://www.heritage.vic.gov.au/protecting-our-heritage/currently-advertised-permits>

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1 March 2022

Submission re Wattle Park Application to Heritage Victoria

I am writing to oppose provision of a Permit (or Exemptions) for this Application.

An absence of Strategic Management processes & inclusion in forming plans and key documents = a recipe for disaster for Wattle Park and degradation of its character and heritage values

It is requested that these works/work plans be withdrawn, halted and/or refused a Permit or Exemption(s), and that the proper, holistic, inclusive management processes for Wattle Park be completed first, including, critically, with effective, embedded community (residents, community, public, community groups) consultation and engagement informing documents and plans, works and 'up-grades'. Plans, 'up-grades' and works should be developed following this process and the orderly, sequential (not concurrent or following works/plan determination) completion of an up-dated Conservation Management Plan (CMP) and a Master Plan (MP) with effective inclusion of community, groups and the public. Informed by that and following that, plans should be made and applications submitted to Heritage Victoria for a Permit. This standard, best practice strategic management process and its documents and inclusion of community, that is, *a comprehensive, integrated planning process*, are central to proper management of Wattle Park but it has not ever been done for Wattle Park and it is missing here.

The *Response for Further Information* (RFI) document included in the Application outlines that the Applicant was asked for a lot of key missing documents and they thus supplied the Lighting information in the application documentation, and they state they have started doing an updated CMP with Lovell Chen, *whilst the Application with detailed works plans is being processed at Heritage Victoria.* ('cart before the horse') This newly commenced draft CMP is incomplete, has not gone to public comment, is nowhere near finalised. Once finalised it should be followed by a Master Plan development process, done with extensive resident, community, group, public engagement and consultation - and that should inform and lead to plans and then to a HV application for a Permit for works, maintenance, 'up-grades' to be done in Wattle Park. It is, at that point that a permit application to Heritage Victoria should be made – not now.

Thus, this whole process that has been undertaken to lead to this application is flawed and inadequate and it has resulted in inappropriate works proposals. What is presented in the application represents poor management and is inconsistent with the arguably unique character and the listed values of the place. A neglect of proper process or best practice management of Wattle Park, and a failure to implement inclusion policies in Wattle Park planning and Strategic Management prior to a HV application has resulted in disconnected, damaging proposals. Inclusion of the residents, communities, public and community groups who are crucial stakeholders of the place is pivotal but has not occurred for Wattle Park yet. (The 'engagement' for this application, apparently externally imposed 'project' plans, is not planning or engagement for Wattle Park, holistically, the whole place and its heritage values and attributes.)

The Applicant, the Managers of state heritage listed Metropolitan park, Wattle Park, Parks Victoria, are putting the cart before the horse, and that puts this highly significant park at risk.

It is advisable that the Application be withdrawn by Parks Victoria, Managers of Wattle Park, or refused a Permit by HV - and that the proper planning process and documents be completed, with the public and community, FIRST, before an application for a permit is made.

Re: the proposed "*construction of new playscape, picnic area upgrade works, resurfacing and extension of existing running/walking track, establishment of Easy Ride Route, and installation of new lighting and signage*": after careful consideration of the documentation provided including the Heritage Impact Statement, exploration of the park, the Statement of Significance on the Victorian Heritage register, and following completion of an initial Strategic Management Plan for the place, these 'up-grade' works proposed are not supported – all are opposed. It is considered they will have an adverse impact on the heritage place and its values.

The RFI document says it all!

The "RFI" document is particularly revealing and contains disturbing information and details. It states, on behalf of Parks Victoria *"in relation to the permit application for the Wattle Park Upgrade Project. Heritage Victoria have expressed a number of concerns arising from the application and have requested additional information..."*

"Conservation Management Plan

*You are required to provide a copy of the completed 2021/2022 CMP. The Heritage Impact Statement, prepared by AECOM, stated: "At the time of writing, only excerpts from Chapters 2 ("The Place and its values") and 5 ("The Place and its components") of the 2021 draft CMP were available for review in the preparation of the HIS". It is important that the proposal is developed and assessed in accordance with the **update management policies**. If the updated CMP contradicts any content in the submitted HIS, please also submit a revised HIS.*

*As previously discussed (5 Oct 21) and confirmed (26 Nov 21), Lovell Chen's work to update the CMP is currently in progress and is not yet complete. We expect to be able to share a draft with key stakeholders at Heritage Victoria early in the new year for any feedback they may have. It is anticipated that there will then also be several other reviews (including discussions with local rangers and tenants) and potential edits to the draft document, prior to its finalisation mid-next year. The updated CMP will include a suite of proposed ongoing permit exemptions that we will submit to Heritage Victoria for review and potential adoption. **These are not yet available.**"*

Residents, community, the public and community groups are completely excluded here! The planning process that should inform works and 'up-grade' plans is completely absent. The fact that they should be done with the community BEFORE an application is sent to HV is seemingly not considered.

In this document they state that the date for draft CMP completion is mid-2022, but the works are already planned and detailed and a Heritage Permit is sought now, in February 2022, and they state that the works are proposed to be completed by September/October 2022.

This represents a major failure in planning for Wattle Park, the whole place. This represents an exclusion of community and the public in the planning process for Wattle Park and its documentation. The planning process, a CMP and its ensuing Master Plan, should be inclusive of effective community input in their formation and the CMP should inform the MP following completion of the CMP, and that should inform 'upgrades', plans and works to then be proposed, and those should form applications to Heritage Victoria (HV) for a Permit. That, however, has not happened. The Plan for works came first. Now they are rushing a CMP at HV whilst this Application is being processed, excluding residents, community, the public and community groups, who are key stakeholders. Hence, this whole Application is *skewwhiff*. The cart is put before the horse. It is just wrong. It is dislocated, out-of-joint, disconnected, fragmented as a planning process, as management of

the place Wattle Park, which needs to be holistic, not piecemeal. This, these plans, this Application, these works, must not proceed.

Pages 1-2 state: *“Together, the 1993 CMP and the relevant excerpts of the 2021 CMP, provide a robust foundation for considering the impacts of the proposed works at the place. Above and beyond the guidance provided in a Wattle Park Upgrade Project 2 CMP, where they exist, heritage consultant’s are suitably qualified to be able to assess the impacts of proposed works.”*

- There is no inclusion of residents, community, the public and community groups in the planning process for the whole place Wattle Park and its key documentation, as there should be. This is an extraordinary omission and an unacceptable exclusion of the community in its park. There is no proper, standard, best practice strategic management process for Wattle Park and that needs to be done before re-consideration of these extensive, place-changing, fractured works or ‘up-grade’ proposals.
- They seem to list three CMPs here, but Wattle Park has only one, as far as is disclosed, and that is the 1993 Conservation Management Plan (CMP). That was done twenty-eight and a half years ago, although HV, NTAV and others recommend upgrading CMPs every ten years.
 - o No CMP is attached with the Application.
 - o The 1993 CMP is not readily available or accessible.
 - o There is no 2021 CMP, or none provided or disclosed or made available. The RFI document states it is not competed.
 - o What is a “Wattle Park Upgrade Project 2 CMP”? It is not disclosed or provided in the Application.

Page 7 Additional bollards are opposed as intrusive to the character of Wattle Park and the open parkland and bush setting. The bollards in the Drive are heritage listed originals and should be retained. Conservation with sensitivity is recommended. Additional concrete bollards are not supported.

The proposal for shared paths with cyclists and for paving of dirt or nature tracks and walkways and/or ‘Tan-style’ granitic (paved or granular) paths is strongly opposed. They have also been done, without consultation, during Lockdown, in Fawkner Park, and have presented many issues, including health and safety issues. The focus of conserving the highly significant place needs to be retaining the natural bush setting and its unique heritage features. Instead, these plans harm them.

Paving the natural paths and walkways is contrary to the listed heritage values and attributes of Wattle Park and would damage the place. Paving new paths in the natural bush settings is inconsistent with the nature focus and character of the place as listed on the

Victorian heritage register and in its statement of significance and would cause significant harm.

Removing trees, nature or greenspace should not be done. The proposed tree removals and estimates of many hundreds of trees that could be negatively impacted by the proposed works is unacceptable and strongly opposed.

See attached an endorsement of critically retaining the dirt walking and running track (NOT paving it, whether with granitic sand material or paved granitic sand material or other) by Eamon Wright, Kieser Exercise Scientist, January 2022. He opposes paving the running and walking track.

I can report to you issues since the granitic paving of the Tan track and also of paths in Fawkner Park, including health and safety issues such as hard, paved surfaces being unforgiving for aging or injured joints or causing injury, respiratory issues with the particle matter, and people desperately trying to continue to walk, run and jog in lawn or dirt/nature, seeking it alongside paths which have been paved, which can cause environmental damage or may not be possible, excluded people, the injured, old and frail from continuing to use the dirt/nature paths and tracks and from enjoying the park.

On page 7 of the RFI document of the Application the Applicant, Parks Victoria, states... *"our Masterplan work, which is currently in progress"*. This is a surprising statement and illustrates the wrong, skewwhiff management of the place, reflected in this poor, fragmented plan or Application. A Master Plan should follow a completed, including with residents, community, the public and community groups, Conservation Management Plan. As the CMP is nowhere near completed and has had not had community involvement yet, it is poor planning and sub-standard heritage management process to begin the Master Plan, again without community/public inclusion. And of course, these planning processes and the CMP and MP documents should be developed, not within a HV application, at HV, but prior.

This is poor management and wrong process and it is hoped these should be grounds enough to refuse a Permit. It is also excluding residents, community, the public and groups, who are the key stakeholders. Putting the cart before the horse – doing these extensive works/development plans first and doing an updated CMP and a MP after plan completion, and apparently concurrently and without community engagement, is an unacceptable, unprofessional and frankly, negligent approach to managing this significant public nature and heritage park. We strongly appeal to Heritage Victoria to not grant exemptions for any works in Wattle Park at this time and not to grant a Permit for these works, but to refuse this Application.

Page 8: alteration to the Heritage Tram Waiting Shelter and Rock Wallis is strongly opposed. It would have unnecessary, adverse impacts on the heritage place and its values. Impacts to the tram shelter and wall need to be absolutely avoided.

The proposed large "S" shaped concrete-paved bike path entry ramps on Riversdale Rd at the old shelter, opposite Alandale St, and removal of sections of this rockery wall are strongly opposed. The priority is to maintain the heritage listed shelter and rockery wall which are highly significant for Victorians and warrant conservation into posterity.

The 'Easy Ride Route' (ERR) initiative is not supported or recommended for Wattle Park. It is not part of an integrated, holistic plan for Wattle Park and it would have significant adverse impacts on the listed values.

Page 12: no access for cyclists and wheelchair users at this entry point into the park is advised.

This Application is done without proper planning process being done FIRST, without strategic management of Wattle Park being done FIRST, hence failing to adequately consider the place, its values and attributes, holistically, in context.

It is disrespectful of the place Wattle Park, which is listed on the Victoria Heritage register as of outstanding heritage value to the people of Victoria and warranting preservation and conservation into posterity. The proposed development works would impact on the authenticity of Wattle Park and its integrity.

With a twenty-eight and a half year-old Conservation Management Plan (CMP) and with NO MASTER PLAN EVER HAVING BEEN DONE FOR WATTLE PARK, this is very poor planning, unacceptable management and it effectively ignores proper processes for the overall planning for Wattle Park. The application development or 'up-grade' works are a piecemeal approach and are not suitable for Wattle Park.

Fourteen documents are provided with the Heritage Victoria Application. This is a proposal for a major re-development of Wattle Park, done however, without the place ever having had the proper, holistic management process done with the public for the entire park, the Victorian heritage listed place Wattle Park

WATTLE PARK, an extraordinary place

Wattle Park is a heritage-listed Metropolitan park of State level high significance. Its "*Statement of Significance*" on the Victorian Heritage register, last updated on November 9, 1999, states:

"Wattle Park is the only example in Australia of a comprehensively developed pleasure park established, owned and operated by a transport authority with the dual aim of promoting its transport services and providing a recreational facility for the public. The layout of the park

and its buildings and structures remain intact in their original 1920s form. ... Together with Royal Park and Studley Park, it is one of the three major inner Melbourne parks that retain a natural bush setting."

<https://vhd.heritagecouncil.vic.gov.au/places/186/download-report>

As a point of difference and defining, key characteristic of this fantastic park as "*one of the three major inner Melbourne parks that retain a natural bush setting*" we believe this – nature and '*natural bush setting*' - needs to be the focus and priority for considering actions, including 'up-grades' and 'maintenance' in Wattle Park.

In considering a Vision for Wattle Park, which remains to be done as part of the still-to-occur planning process, we see it as, for example:

Vision:

to maintain and conserve Wattle Park as a distinctive nature and heritage park.

i.e. with minimal paving and new constructed environments; protecting and conserving the natural landscape, greenspaces and environments of Wattle Park and its heritage places; progressing plans for making Wattle Park an Urban Dark Night Sky Place/Park.

The proposed "playscape" will be damaging to the character and listed values of the Park. It is inconsistent with the characteristic nature, bush land values and the open parkland character of the place and may detract from or prevent solar and night sky viewing and astronomical activities that occur at Wattle Park, including in that area.

It is premature for an application for a permit for works, up-grade works, maintenance works, development works.

Funding has been made available for a proper planning process to occur for Wattle Park and that should be done. That is, not as proposed in the (RFI document, doing a perfunctory CMP and MP after the event of major development plan production and application for permit, but doing the planning processes and documentation for Wattle Park (Conservation Management Plan and Master Plan) to discern appropriate action .

In line with the unique selling points (USPs) of Wattle Park, a Vision for maintaining and conserving Wattle Park as a nature and heritage Park, consistent with its listed values, the increased need for nature spaces and parks in the new, on-going Covid world, and for nature and greenspace conservation for adaptation and mitigation of climate change effects and extreme weather impacts, particularly in urban areas, and for the concomitant positive

impacts on mood, health and well-being, re-consideration of paving the walking and running track and of constructing built environment play area is critical and timely.

Eg See ABC article 21/1/2022 re research on the positive effects of nature environments.

'*Time in Nature is Good for Our Mental Health ...*', Navjot Bullar for Ockham's Razor 21 January 2022 www.abc.net.au/health

"What is it about greenery that lifts our mood?" The article considers research and the *restorativeness* of nature as a key benefit for humans, particularly those in an urban environment. Psychological benefits include exposure to stimuli we find pleasing such as green spaces tend to make us feel relaxed and reduce stress levels. Research reported found that the effect of nature exposure on our well-being varied depending on the type of nature (wild versus urban).

With Wattle Park we are fortunate to have "a natural bush setting". Why would the Applicant choose to seek to diminish, remove, damage, that? Why would you cut down and risk damage to many hundreds of trees, remove green infrastructure and nature for cycle paths in a nature, bush and heritage park? It is ill-conceived.

Lighting proposals: strongly opposed

Preparing an application for **Wattle Park to be named an Urban Dark Sky Place/Park:
highly supported and recommended**

The Application proposal for night-time lighting is strongly opposed, for its adverse impact on humans, nature, the environment and Wattle Park. Also because it would disadvantage or prevent astronomical activities, stars viewing and casual night sky observing

Research shows that night lighting does not improve safety, it simply reduces your fear, which in effect is more dangerous for you.

Ref. Dr. Barry Clark, 31 January 2022, "*Adverse Consequences of Installing More and Brighter Lighting at Wattle Park*"; submitted to Heritage Victoria and Parks Victoria. He writes in this and in an additional submission to this Application that the proposed Lighting for Wattle Park is not compliant with Australian Standard, AS 4282- 1997, Control of the Obtrusive Effects of Outdoor Lighting and that compliance is required.

He supports Wattle Park as a 'dark park', ie typically not illuminated by on-site fixtures for social, environmental, scientific and economic reasons. He writes that the relatively large area of the Park and its low existing level of ambient light at night suggests that it should be treated as an A2 Environmental Zone (Table 3.2 in AS/NZS 4282). The background for astronomical, field naturalist and aesthetic observations from within the Park will often be the night sky, which supports this choice of Zone- see clause 3.3.5.2 in 4282). The Standard imposes stringent limits on the applicable light technical parameters within all A category Environmental Zones"

Dr Clark concludes a substantial moderation or abandonment of the existing and proposed lighting changes is required.

As Director of *Walk in St Kilda Road & Environs* I instituted annual *Planet Ark National Tree Day Nature Care Events*, and this has included two Lighting Expert Panel Presentations in 2019 and 2021. The last one, "*Lighting and Green Spaces an Expert Panel Presentation on new research and challenges*" was held at the Prahran Mechanics Institute on 26 June 2021.

Speakers included Dr Clark, Dr Greg Moore, arguably Australia's foremost arborist, Chair of the National Trust Register of Significant Trees since 1996 and a former Principal of Burnley College, and Assoc. Prof Sean Cain, Monash University, an expert and International researcher on the damaging effects of night lighting on circadian rhythms, health and well-being.

See attached:

- the programs for 2019 and 2021 Lighting Panels
- the Presentation by Dr Greg Moore "It's the public greenspace that matters: trees, covid, and the value of parks", 26/6/2021
- some information on refereed papers by Assoc. Prof Sean Cain, Monash University

These provide research findings and evidence of the damaging effects of artificial night lighting.

There is solid, increasing research evidence that artificial light at night (ALAN) adversely affects living things, animals and humans too. ALAN is an increasingly recognized threat to biodiversity and ecosystem processes and has recently been proposed as a driver of insect declines. Night lighting has wide-ranging negative effects on insects across their life cycles, including inhibiting adult activity, increased predation, and disrupted reproduction.

Recent research provides powerful evidence of lighting's damaging effects on insects, and this has consequences for parks and gardens and heritage parklands and natural bush environments such as Wattle Park. Without a healthy insect population and environment we lose plants, trees and greenspaces.

"Negative impacts were more pronounced under white light-emitting diode (LED) street lights compared to conventional yellow sodium lamps. This indicates that ALAN and the ongoing shift toward white LEDs (i.e., narrow- to broad-spectrum lighting) will have substantial consequences for insect populations and ecosystem processes."

Ref. Abstract, "*Street lighting has detrimental impacts on local insect populations*", SCIENCE ADVANCES, published 25 Aug 2021, Vol 7, Issue 35, DOI: 10.1126/sciadv.abi8322 <https://www.science.org/doi/10.1126/sciadv.abi8322> describing the damaging impact of white LEDs.

The Astronomical Society of Victoria (ASV), founded in 1922 by staff at Melbourne Observatory, is one of Australia's oldest amateur astronomy clubs. The ASV has its

Melbourne office/HQ and telescopes nearby, and they hold public and member viewings both there and at Wattle Park. Wattle Park is also popular for casual astronomers and for public star gazing. This is a growth activity in the years since Covid, following Australia's founding of the Australian Space Agency in July 2018 and with the acceleration in news, findings, research and travel into space. Astronomy, whether with the naked eye or equipment offers endless fascination for families and individuals and a *dark park* at Wattle Park is a rare urban opportunity, one I strongly endorse. As no strategic planning process and Master Plan for Wattle Park has yet been completed, such important possibilities, highly desirable and entirely consistent with the heritage values of the place, and protective of the nature, insects, wildlife and humans in the Park, have not been considered by the Managers of Wattle Park yet, or in this fragmented proposal. The proposals for lighting presented are not compatible with this, would cause 'Light pollution', light spill or scatter and an artificial skyglow.

Upward waste and downward light spill would need to be removed and undone to proceed with enabling and becoming a designated Dark Night Sky Place/Park.

Recommendation: Wattle Park - to be designated as an Urban Dark Sky Place/Park

Protecting and recognising the night sky at Wattle Park

I believe this would be supported by Heritage Victoria, the National Trust, Protectors of Public Lands, the Royal Historical Society of Victoria, the Australian Garden History Society, the ASV and other Astronomy clubs and societies, Planning Democracy, community groups, the public and local residents. Establishing support by Parks Victoria, and Council, (Whitehorse) making a Council Resolution, preparing a submission outlining low, focussed minimal lighting and avoidance of light spill etc... would mean that an application to the International Dark Sky Association could be progressed.

<https://www.nationalparks.nsw.gov.au/conservation-and-heritage/our-parks/dark-sky-parks>

“What are Dark Sky Parks? International Dark Sky Parks are publicly or privately-owned spaces that have exceptional starry nights and a nocturnal environment. Dark Sky Parks are specifically protected for their scientific, natural, educational, cultural heritage, and/or public enjoyment.”

Dr Barry Clark, who has written two reports on lighting and Wattle Park and has submitted them to Heritage Victoria, is a committee member of the International Dark Sky Association of Victoria (IDAVic.) and of the Astronomical Society of Victoria (ASV); he is Director of the Outdoor Lighting Improvement section and a committee member of the ASV. He recommends that the size of Wattle Park and its existing low level of ambient light at night means that it should be treated as an A2 Environmental Zone for the purposes of lighting.

<https://www.darkskyvic.org/>

<https://www.darkskyvic.org/about/>

<https://asv.org.au/light-pollution>

I have spoken with Marnie Ogg, Director, the Australasian Dark Sky Alliance (ADSA), Director of Dark Sky Traveller and Fred Watson AM, Australia's first Astronomer-at-Large in the Commonwealth Department of Industry, Science, Energy and Resources, who support our campaign to have Melbourne Observatory declared an Urban Dark Sky place and have made presentations to MCC about the matter, as I have and Dr Clark, along with others, are supportive of Wattle Park as an Urban Night Sky Place or Dark Sky Park.

To garner support and have a Whitehorse Council resolution made for an application to have Wattle Park designated as an Urban Night Sky Place by the International Dark Sky Association requires retaining it as a nature place, not doing the obtrusive outdoor lighting proposals in this piecemeal, disjointed application to Heritage Victoria, done without and outside of holistic planning process for the place, avoiding light spillage.

An Urban Night Sky Place (UNSP) is a municipal park, open space and observing site near or surrounded by large urban environs. **Its planning and design needs to actively promote an authentic night-time experience** in the midst of the surrounding urban environment of Wattle Park. Currently there are significant opportunities for proceeding for nominating Wattle Park as UNSP and it is harmonious and compatible with its heritage listing and character as a nature place. This would be a real advantage and edge for Wattle Park and the community, a point of difference and an added value for visitors and users of the Park.

I have spoken with some key staff responsible for the management of Wattle Park at Parks Victoria about this and they have expressed support for my proposals to them for doing proper strategic management of the place with its CMP and MP documents first etc ... and the recommendation to submit an application to have it designated as an International Urban Dark Sky Place (or Urban Night Sky Park), some showed significant enthusiasm. Comments included that, though they are 'responsible' and/or 'accountable' and Parks Victoria is the Manager of significant heritage place Wattle Park, they did not make these works development plans and proposals, that 'the government did', and that they have not had much involvement. For the sake of Wattle Park and for public benefit in conserving and protecting this Victorian Heritage listed place, clarification and streamlining of who at Parks Victoria is responsible for management of Wattle Park, would assist greatly to get its management on track and is urgently needed to protect the place. Following that, establishing a Community Reference Group or Community Advisory Committee, to be embedded effectively in the planning stages pre-works/up-grades plan finalisation, would also assist.

Eliza's Vision: A History of Wattle Park 1838-2006"

Author of *"Eliza's Vision: A History of Wattle Park 1838-2006"*, Prahran Mechanics Institute Press, 2006, Ray Peace has aptly stated in his public *Petition to Parks Victoria to Save Wattle Park* and cease these proposed works:

"The State Government has budgeted \$4.3 million to 're-imagine' and 're-invent' Melbourne's iconic Wattle Park, Victoria's only tramway park, and a haven of peace and natural beauty for local residents for over 100 years. Wattle Park needs preservation and maintenance."

He continues: "The proposed 'playscape' is out of keeping with the ambience of Wattle Park. The existing playground does need upgrading, but not replacement with a structure which does not blend with the environs of Wattle Park. The park is noted for its open forest appearance. Designs for a new playground should ideally reflect that" and "(T)he existing path network needs maintenance but does not require the upgrades envisaged under the new plan. The paths are best suited for pedestrians, and this should remain their primary function" – and these are strongly supported.

Mr Peace concluded:

"Wattle Park has long been 'The Home of Nature'. Keep it that way"

- and that is a central message and reason to refuse a permit for these intrusive, out-of-character works.

28 February 2022 UN Report on Climate Change:

On the 28 February 2022 the UN released its latest report on world research on climate change, involving 270 climate experts from 67 countries. Their major IPCC report warns "Billions to suffer impacts of climate crisis as window for action rapidly closes"; "the authors say we need much faster "transformational" action" and they declare that "Adverse impacts are "cascading" along coasts and cities, and in mountainous regions. These hazards trigger tipping points in sensitive ecosystems". They assess Mental Health impacts for the first time, and "link them to rising heat, trauma from extreme events" and stress that *'the world faces 'brief and rapidly closing window of opportunity to secure a liveable and sustainable future'*.

It is hoped the Managers of Wattle Park will see the urgent need to re-assess and re-think their proposed plans also in light of this Report. (Australia is specifically listed as suffering some of the worst effects such as fire, smoke pollution, extreme heat, floods, storms, animal and insect extinction events etc...).

The Report expresses **how reliant humans are on nature and healthy ecosystems**. It calls for conserving up to 50 per cent of land, fresh water and ocean habitats, along with **restoring degraded ecosystems**. It states that “Cities, home to more than half the global population, are hotspots of impacts and risks, but are also a crucial part of the solution “ We have a responsibility, an imperative and duty of care to reassess this application in a proper planning process and to incorporate considerations of making adaptations for climate change to maintain and protect nature, greenspaces or ‘green infrastructure’, the trees, parkland and bush at Wattle Park, including dirt trails and walking tracks and not to remove, light and pave it.

Some of the proposals in the application would be classified as what they term “**Maladaptations**”, which have especially negative impacts and they call on councils and governments to rectify and cease such actions, **to focus on protection and restoration of natural environments and on mitigation** – what needs to be done to limit planet-heating, greenhouse gas emission, loss of greenspace and nature, and to provide solace for us and for our health.

Dr Helen Adams, a senior lecturer in disaster risk reduction and climate change adaptation and IPCC author, said **the path or progression of climate change would be determined by the choices that societies and decision makers take...** “Yes, things are bad,” she said. “But the future depends on us.”

“Hoesung Lee, chair of the IPCC, called the report “**a dire warning about the consequences of inaction. Our actions today will shape how people adapt and nature responds to increasing climate risks,**” he said.”

Yet, without the best practice, holistic Strategic Management process for Wattle Park having been done yet, these critically important issues of climate change and global warning have not been addressed and they are not included in these proposals and development works. The application works presented would have the opposite effect to that recommended - they would increase heat island effect, remove greenspace and trees, diminish beneficial, relieving and mood enhancing effects of nature, of seeing and walking in a natural bush environment. This is a major shortcoming of the application too as adaptations and coping mechanism to strengthen greenspaces, particularly in cities and urban environments and places like Wattle Park are key to liveability.

Ref.: <https://www.independent.co.uk/climate-change/news/ipcc-climate-report-global-warming-floods-b2024490.html> 1 March 2022

<https://www.independent.co.uk/climate-change/news/climate-crisis-mental-health-ipcc-b2024446.html> Mental health and psychosocial effects of climate change and extreme weather are cascading. - UN Report 2

This report said the research showed the climate crisis had “adversely affected” mental health in regions looked at, as well as physical health around the world with documented psychosocial effects.

Ref: <https://www.independent.co.uk/climate-change/news/ipcc-un-report-ten-findings-b2024549.html> By Louise Boyle and Harry Cockburn, Tuesday 1 March 2022

This article considers the report’s findings that, with cities and urban environments suffering the most and causing most damage to the environment, ‘fragmented responsibility for planning’ was identified as a key hindrance delaying urgent adaptation for disaster management, and mitigation and adaptation actions including the development of policies, in combination with rapid urbanization and ‘*lack of climate sensitive planning.*’

This Wattle Park application/proposals are an example of that *fragmented responsibility for planning* hindering best practice management and of the culpable *lack of climate sensitive planning* they analyse, as many of the proposals (paving, hard surfaces replacing natural dirt and grass trails and paths, tree removals, adding artificial lighting, constructing built environment playgrounds...) are contrary to the Report advice. Urgent efforts need to be made to redress this, to halt these plans.

The IPCC expressed high confidence in **the economic and ecological feasibility of so-called “green infrastructure”**, yet these proposals seek to damage, diminish or remove it.

The IPCC report: presents 10 key findings from major global climate assessment. It is the second chapter of the Intergovernmental Panel on Climate Change’s most detailed report in seven years and was published on Monday.

“The world’s leading authority on the climate crisis, the Intergovernmental Panel on Climate Change (IPCC), has published the second chapter of its most sweeping assessment in seven years. The report describes how the climate crisis is a threat to human wellbeing and the health of the planet, and calls for urgent, transformative action to secure our future”.

These proposed works are not compliant with the Report’s recommendations.

Conclusion

Wattle Park is a wonderful, special park, with critical key features as a Nature and Heritage Park in Melbourne’s urban east. We need to preserve and conserve the nature and heritage features rigorously or risk losing them.

Paving the periphery dirt running and walking track and building constructed environment play areas prior to an up-dated CMP and a MP with extensive resident, community, group consultation and engagement in forming the documents and plans, would risk both alienating the community, and carelessly, with inadequate strategic heritage management processes for the place, losing the special nature and special heritage

aspects of the place and its integrity and authenticity, representing a serious, avoidable loss to the community, to Melbourne, Victoria and all Australians and visitors. This must be avoided.

In conclusion, the Application is premature and not adequately planned and considered.

This fractured approach to management of Wattle Park is sub-standard and Wattle Park, its local residents, Victorians, visitors, the public and community groups deserve more, deserve proper strategic management and dedicated, comprehensive conservation of this heritage place. Excluding the well-established process for managing the heritage place: a Conservation Management Plan (usually updated every ten years) , done with the community and public; followed by a Master Plan (usually up-dated every ten years), done with embedded consultation and engagement with residents, the public and community groups, leading to/informing plans and actions for the whole place, and then detailed 'up-grades' and an application to Heritage Victoria for a permit, is the standard, required, best practice process. That has not occurred here. Here we have a disjointed, not integrated, unilateral approach, one that appears it may be externally imposed on the place and the community, one done without proper, inclusive, holistic planning processes first, without considering the whole place Wattle Park and its listed heritage values and attributes first and centrally- and this should occur before any works or 'up-grades' are decided or proceed.

We strongly urge Heritage Victoria to urge Parks Victoria to withdraw the application and to put these proposed works on hold, while a Conservation Management Plan, followed by a Master Plan is done with extensive consultation with community, residents and community groups and a holistic consideration of Wattle Park is undertaken together.

To proceed with this fragmented, constructed, externally imposed major development of Wattle Park with a twenty-eight and a half year old Conservation Management Plan and with no Master Plan ever having been done for this place, one formally acknowledged as of high significance to all Victorians and requiring conservation and preservation into posterity, would in effect be an attack on Heritage itself, on proper Management of the place, on inclusion in forming plans and determining works/upgrades.

With a Conservation Management Plan being drafted or written whilst the Application is being processed at Heritage Victoria, and AFTER all these works detailed in the Application have been determined, decided and submitted as a plan, and with the concurrent, non-transparent, non-inclusive drafting of a Master Plan said to be taking place, you can see how this puts the heritage place at very considerable risk, with ad hoc ideas that make no sense in the context of this very particular nature and heritage park included in this application rather than a careful Strategic Management. Seeking a Heritage Permit for piecemeal plans done without a proper and inclusive strategic planning management process and without having already completed its documents (CMP, then MP) is a recipe for disaster, excludes the public and community, wrongly, and will cause harm and poor outcomes for Wattle Park and the community.

We call for a halt on these “Suburban Parks Program” plans and actions for developing Wattle Park whilst the proper strategic management process of *CMP – MP – upgrades/works plans* be undertaken for Wattle Park with residents, community and groups, first, outside of Heritage Victoria.

We ask that the Executive Director of Heritage Victoria refuse a Permit for these works, for this Application. Additionally, in the circumstances, we strongly urge Heritage Victoria not to provide exemptions.

Thank you for the opportunity to make a submission.

Sincerely,

B. McNicholas

Director, *Walk in Sr Kilda Rd & Environs*

Heritage and Strategic Management

Convenor of *Planet Ark National Tree Day Nature Care Events* and *Lighting Panel Presentations*

Attached: Statement by Eamon Wright, Exercise Scientist, Kieser, January 2022

- the programs for *Walk in Sr Kilda Rd & Environs* Planet Ark National Tree Day Nature Care events: Lighting Expert Panel Presentations, 2019 and 2021
- the Presentation by Dr Greg Moore “It’s the public greenspace that matters: trees, covid, and the value of parks”, 26/6/2021
- some information on refereed papers by Assoc. Prof Sean Cain, Monash University These provide research findings and evidence of the damaging effects of artificial night lighting.

Some references:

Dr. Barry Clark, 31 January 2022, “*Adverse Consequences of Installing More and Brighter Lighting at Wattle Park*”; submitted to Heritage Victoria and Parks Victoria

Walk in St Kilda Rd & Environs, Planet Ark National Tree Day Nature Care Event 2021: "Lighting and Green Spaces- an Expert Panel Presentation on new research and challenges", Sunday 27 June 2021, Prahran Mechanics Institute, Melbourne, Vic.

This includes presentations and papers by Dr Greg Moore, Assoc. Prof. Sean Cain, Dr Barry Clark and myself. (copies of presentations available on request)

"Street lighting has detrimental impacts on local insect populations", SCIENCE ADVANCES, published 25 Aug 2021, Vol 7, Issue 35, DOI: 10.1126/sciadv.abi8322

<https://www.science.org/doi/10.1126/sciadv.abi8322>

<https://www.independent.co.uk/climate-change/news/ipcc-climate-report-global-warming-floods-b2024490.html> : 1 March 2022; How reliant humans are on nature and healthy ecosystems

<https://www.independent.co.uk/climate-change/news/climate-crisis-mental-health-ipcc-b2024446.html> Mental health and psychosocial effects of climate change and extreme weather are cascading. - UN Report 2

Ref: <https://www.independent.co.uk/climate-change/news/ipcc-un-report-ten-findings-b2024549.html> By Louise Boyle and Harry Cockburn, Tuesday 1 March 2022

ABC 21/1/2022: research on the positive effects of nature environments: *'Time in Nature is Good for Our Mental Health ...'*, Navjot Bullar for Ockham's Razor 21 January 2022 www.abc.net.au, health