

23 October 2018

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Re: Domain Parklands Master Plan

Dear Ms Kiss,

Thank you for providing an opportunity to provide feedback on the *Domain Parklands Master Plan 2018*.

The National Trust of Australia (Victoria) is state's largest community-based heritage advocacy organisation actively working towards conserving and protecting our heritage for future generations to enjoy, representing 28,000 members across Victoria. The National Trust maintains a Heritage Register of Significant Places, and has classified the Domain Parklands as being of National significance, the Royal Botanic Gardens Melbourne at State level significance, along with a number of significant trees (both at state and regional level) in the parkland.

As Victoria's premier heritage and conservation organisation, the National Trust has an interest in ensuring that the wide range of natural, cultural, social and Indigenous heritage values of the Domain Parklands are protected and respected, contributing to strong, vibrant and prosperous communities. Furthermore the National Trust is the custodian of La Trobe's Cottage, the land on which is leased under the *The Crown Land (Reserves) Act 1978*.

The National Trust has been involved in earlier consultation on the preparation of this Masterplan, with submission made in July 2016 and July 2018. We acknowledge that this document has taken a number of years to get to the current stage and has been subject to focused community and stakeholder consultation. We support the finalisation of the Domain Parklands Master Plan, taking into account our comments below.

Masterplan Values

We support the fundamental principle in the plan that there be "no net loss of parkland" and that "future change should bring positive benefits to the Domain Parklands" (page 18). Furthering this, the National Trust suggests that the aim of the Masterplan should be focused toward increasing parkland and associated greenspace within. This should be taken into account with regard to increased paved surfaces and recreation facilities which should not come at the expense of greenspace or the loss of trees.

We support each of the 5 values outlined at this section of the plan: A healthy and resilient parkland; a parkland of history and cultural heritage; a parkland for people; a parkland that connects; and a parkland of partnerships.

Masterplan Themes

We make comments under the themes with reference to the subheadings of this section.

4.1 Nurture a Diverse Landscape and Parkland Ecology

4.1.1 Elevate horticultural complexity and management

We support the development and implementation of a management plan and guiding principles for horticultural work in the landscapes.

We acknowledge that there are unusual and rare tree plantings across the Parklands, planted at various times of the parks development. The National Trust supports any plan that ensured the continued presence of significant, rare and unusual trees in the Domain. With regard to this, the Statement of Significance for Domain Parklands states:

The Domain Parklands contain a number of well established and intact avenues and groups of trees to create a landscape of outstanding quality and diversity. There are avenues, rows and/or specimen trees of Ulmus, Platanus, Populus, Quercus, Ficus, Eucalyptus, Corymbia, Angophora, Callitris, Agathis, Schinus, Juniperus, Pittosporum, Erythrina, Rapanea, Brachychiton, Elaeodendron, Calodendrum, Cedrus, Pinus, Cupressus, Araucaria, Olea, Cinnamomum, Magnolia, Grevillea, Fraxinus, Alectryon, Agonis, Syncarpia, Syzygium, Lophostemon, Lagunaria, and Butia, Phoenix and Washingtonia palms. The wide variety of tree forms, evergreen, deciduous trees providing autumn colour, leaf shapes and palm fronds, dense conifer foliage (green, golden and blue), bark texture and colour, all combine to give a contrasting and diverse landscape of high landscape and aesthetic value.

With regard to replacement tree planting as addressed by any management plan, we submit that any tree with recognised heritage or commemorative significance (including species listed above), be replaced like for like. This is also a relevant consideration under '4.1.3 Manage a city arboretum'. That said, we are aware that climate change may have an effect on the useful life expectancy and maintenance of some of these trees, and decisions may need to be made about whether like for like replacement is viable. In such a case, we would expect that scientific evidence as to a change of species should be required to support this change. A solution may be to choose species which retain the same values that make a tree significant, and retain the same form or character as the tree to be replaced. This would help to address any difference posed by a species change.

The decision making process of replacing any commemorative plantings is an issue that needs to be considered. A guideline might be adopted where each tree is replaced by an appropriate tree in the same place, and if applicable, taking into account any cultural or geographic association between the selected species and the commemorative purpose.

We support investigation and investment in alternative water supply systems, recognising that this will play a crucial role in the ongoing management of this heritage landscape. The National Trust, through its role as a land manager of La Trobe's Cottage within the parklands, would welcome the opportunity to partner with the City of Melbourne to assist in the use of water and management of the garden at that property.

4.1.3 Manage a city arboretum

The National Trust supports the proposal for a City Arboretum and for tree succession planning and population renewal on the Domain Parklands site.

4.2 Acknowledge History and Cultural Heritage

The National Trust agrees that acknowledgement of Aboriginal cultural heritage has been a missing layer in the current Domain Parklands. We support the City of Melbourne in ongoing consultation and meaningful engagement with Traditional Owner groups regarding the management, interpretation and access of the Parklands.

We note that this section refers to Indigenous in relation to Aboriginal people/sites without capitalisation. We submit that any use of Indigenous in this way throughout the document should be capitalised.

4.2.1 Respect and reveal the Aboriginal cultural heritage

We note under actions here that the future use of Aboriginal place names is a consideration. We submit that any consideration of using Aboriginal place names must be undertaken through meaningful consultation and with permissions of Traditional Owner groups. We strongly support the development of a joint Cultural Heritage Management Plan to guide the ongoing management of the landscape.

The National Trust is committed to Reconciliation and is currently in the implementation of our third Reconciliation Action Plan. As part of this plan we are committed to strengthening our relationship with Aboriginal communities through research and interpretation of our places. We have intentions to further investigate the Aboriginal cultural heritage connections in relation to La Trobe's Cottage. As such we would be interested in working further with the City of Melbourne as we develop such interpretation. We would welcome the opportunity to discuss further with the City of Melbourne how La Trobe's Cottage might be integrated into the self-guided Aboriginal cultural heritage Melbourne walk of the Domain Parklands and Royal Botanic Gardens Melbourne.

4.2.2 Reflect cultural values and historical significance

The role of the parklands as a setting for St Kilda Road should be added under this section, alongside Government House, the Shrine of Remembrance, Sidney Myer Music Bowl, the Melbourne Gardens and Observatory (page 23). This is important given that St Kilda Road is included in the registration in the National Heritage List of Melbourne's Domain Parkland and Memorial Precinct.

La Trobe's Cottage (VHR H1076) contributes to the cultural and historical significance of the Domain Parklands and is referenced in the Victorian Heritage Register Statement of Significance for the Domain Parklands. While La Trobe's Cottage is not located in its original site, its cultural and historical significance as a symbol of Melbourne's early European settlement aligns with the character of the Domain Parklands. As such we submit that La Trobe's cottage also be added to the list of settings referenced on page 23.

The National Trust supports the Action listed under 4.2.2 to promote an increase in community understanding and recognition of cultural heritage in the parklands. We consider that this action could be more strongly worded with reference to implementation measures (interpretative signage for instance).

4.2.3 Manage memorials in Domain Parklands

We support the proposal that no further large memorials are to be placed in the Kings Domain, and that future memorialisation only be considered where it could become part of the

landscape rather than as a specific element. The National Trust agrees that horticultural memorials are more consistent with the landscape character of the Domain Parklands, and provide greater opportunities for enhancing a visitors experience and appreciation of the site and its heritage.

With regard to the City of Melbourne 'Plaque and Memorials Policy', we made the following comments regarding this policy as part of a submission regarding the Victorian Emergency Services Memorial in February 2018. We note that the 'Plaque and Memorials Policy' document is undated, and recommend that a date is added for consistency with reference to other similar policies held by the City of Melbourne. We would expect that a rigorous and thorough process of review is undertaken of any memorial requests made to the City of Melbourne. We recommend that all other options for memorialisation via the 'Out of Scope' suggestions made in the 'Plaque and memorials Policy' document, are prioritised as a first option for memorialisation. We would expect that any request for memorialisation would sufficiently demonstrate why these 'Out of Scope' options are not appropriate. The National Trust does not support an ongoing process of continually adding memorials to Melbourne public spaces and gardens. While we supported the proposal of the Victorian Emergency Services Memorial for its landscaped response, as a 'flagship project for memorialisation' in Melbourne, we would not support a large number of such proposals to be made throughout the city without being subject to rigorous assessment and public consultation.

4.3 Support Exceptional Visitor Experience

4.3.2 Enhance visitor experience

With regard to the new ANZAC Station and the opportunity that this presents to create a new entrance to the parklands, the National Trust submits that a path also needs to be created to bring visitors to the entrance of La Trobe's Cottage. We request that La Trobe's Cottage be added to the list of Actions at this point alongside the Melbourne Gardens and the Shrine of Remembrance. As requested in our July 2018 submission regarding this Masterplan, we suggest that the City of Melbourne work in partnership with the National Trust on the establishment of a new entry to the Parklands through the ANZAC station precinct. We consider that La Trobe's Cottage can play a role in telling the important stories of this significant cultural landscape, including under the themes of 'civic and governance' and 'the settlement and planning of Melbourne' referenced on page 26 of the Masterplan. The role of the Cottage in the early stages of cultural heritage identification and protection in Victoria is also worthy of consideration as a theme related to the more recent history of planning of Melbourne.

With regard to Edmund Herring Oval, the National Trust considers that this ground is of social significance for its association with generations of communities who have played and gathered at this location. It is also noted that it has significance in relation to the adjacent Melbourne Grammar School, who funded the construction of the ground after World War I (referenced in the Heritage Impact Statement for Edmund Herring Oval, prepared by Trethowan, November 3 2017, for Cross Yarra Partnerships, Melbourne Metro Main Works). In response to the possible installation of sports lighting at Edmund Herring Oval we submit that any impacts of this on the heritage values of the overall site are considered, especially in relation to the use of the Melbourne Observatory site. Before such a proposal is put forward the National Trust strongly suggests that the City of Melbourne undertake community consultation, as well as

more detailed consultation with the Astronomical Society of Victoria, who regularly operate the Observatory, along with the Royal Botanic Gardens Victoria who manage the site.

4.3.4 Manage events

We support the City of Melbourne in managing the impacts of organised events on the heritage significance of the Domain Parklands. This is important in maintaining the health and condition of the landscape. Providing more significant pause times between events in the same location is recommended. We note a suggestion to, where appropriate relocate some events to the Sidney Myer Music Bowl, and we note that this is also a heritage place subject to the cumulative impacts of large events.

4.4 Improve People Movement and Access

4.4.1 Improve parklands entrances

As with our comments above, we request that La Trobe's Cottage be added as a place under the 'Improve entrances' action here.

At present, visitors to La Trobe's Cottage walk over the gardens and grass of the Domain Parklands when approaching from Birdwood Avenue, or via a rough gravel path from the Dallas Brooks Road side. A pedestrian pathway for both of these approaches, along with associated signage would significantly improve a visitor's experience of La Trobe's cottage and its contribution to the larger landscape of the Domain Parklands.

4.4.2 Improve internal pathway networks

We note a number of actions that may impact on paths within the Domain Parklands and we recognise that there is a requirement to update pathways for accessibility. We submit that limited changes should be made to general shape of paths, as they pertain to the heritage of the Parklands. We note in the Victorian Heritage Register Statement of Significance has several references to path forms: 'curving paths'; 'winding pathways'; 'symmetrical path system'; and 'diagonal paths'. Any changes to the established heritage path system should only be made if shown to be completely unavoidable. Consideration should be made to historic and heritage value of the existing (or lost) path systems in the planning of path networks, including within the Sidney Myer Music Bowl.

The National Trust holds reservations that about the possibility of a 'tree top walk' north of Sidney Myer Music Bowl, and would welcome any future opportunities to provide feedback on the development of such plans. Impacts on the heritage values of the Domain Parklands and view lines to and from the Yarra River are a key consideration in any such proposal.

4.3.3 Reduce barrier and improve access over roads

The National Trust suggests that any examination of Alexandra Avenue and its impact on park visitors (i.e. as a parkland barrier) takes into consideration the significance of the avenue given its innovative design and association with engineer Carlo Catani in his development of the Domain in the late 19th and early 20th century, as referenced in the Victorian Heritage Register statement of significance.

With reference to the investigation of an additional bridge across the Yarra River between Princes Bridge and Swan Street Bridge, we submit that this is a major project and would significantly alter this section of the Yarra River. Any further consideration of a bridge at this

point, should be undertaken in consultation with the Birrarung Council as part of the broader *Yarra River Protection (Willip-gin Birrarung Murron) Act 2017*.

4.4.6 Contemporary way finding in the Domain Parklands and

4.4.7 Create journeys in the Domain Parklands

The National Trust welcomes opportunities to work with the City of Melbourne to include La Trobe's Cottage in any way finding strategy or new proposed walks for the Domain Parklands. We request to be included as a stakeholder as part of the consultation for these strategies.

4.4.8 Rethink the use of existing road space

The National Trust supports the City of Melbourne's consideration of measures to reduce the impact of traffic and car parking within the Domain Parklands, especially with regard to the landscape character of the site.

In the masterplan actions under this heading, consideration must be made to the development and formation of roadways in the history of the Domain Parklands. Similar to the pedestrian pathways of the Domain Parklands any changes to the general shape of established road systems should only be made if shown to be completely unavoidable. It is noted that these drives, and their associated landscaping (eg rockeries and avenue planting) are recognised in the Statement of Significance for the Domain Parklands.

4.4.9 Car parking - support visitor access while adapting to future trends

The National Trust agrees that the parking of vehicles within the Shrine Reserve is inconsistent with the park values and is detrimental to the health of trees. One such tree that is parked under is a Long-Leaved Indian Pine (*Pinus roxburghii*), included in the National Trust Register of Significant Trees. We strongly support the action to minimise the parking of cars on the landscape within Kings Domain South, and submit that this should read 'minimise and remove the parking of cars' in this area. Removing car park altogether under the Long-Leaved Indian Pine is strongly recommended.

4.5 Management and Partnerships to Build Resilience

4.5.2 Create a framework for priorities and decision-making

The development of an implementation plan is essential, given the aspirations and complexity of the Masterplan document. We submit that detailed plans for the projects proposed in this plan are subject to community consultation.

We support a review of the Masterplan for Council endorsement in 2028, noting that this provides an opportunity to review progress of actions under the plan. This will be an important keystone in the Masterplan given that it has a lengthy timeframe of 20 years. We submit that any review that occurs should be subject to community consultation to allow a chance to capture the community's ongoing aspirations for the Parklands, as well as feedback on the achievement of the Masterplan to that date.

La Trobe's Cottage reference

We note some instances across the document when La Trobe's Cottage is incorrectly referenced as 'Latrobes cottage'. We request that the correct name for the place is used in the document: La Trobe's Cottage.

Conclusion

The National Trust considers that the *Domain Parklands Master Plan 2018* is worthy of council adoption, taking into account our comments above. It is a comprehensive and wide ranging document that sets out a strong intention by the City of Melbourne in the ongoing management and celebration of the Domain Parklands. The National Trust welcomes further opportunities to provide feedback on specific implementation measures, in line with our submission.

For any enquiries regarding this submission, please contact me on 9656 9823 or at jessica.hood@nattrust.com.au

Yours faithfully,

A handwritten signature in black ink, appearing to read 'J Hood', written in a cursive style.

Dr Jessica Hood
Community Advocate Environmental Heritage