



27 February 2019

Mr Steven Avery
Executive Director
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File No: G13144

Re: Submission to Heritage Victoria Permit Application P29324, Fawkner Park

Dear Mr Avery,

Thank you for the opportunity to respond to the above permit application which seeks to undertake improvement works to the Pasley Street entry zone including the removal of the existing basketball court, the construction of a new sports court further to the west of the existing facility, landscaping works, drainage improvement works selected tree removals and new tree planting works and the construction of two new pathways providing access to the new sports court facility.

The National Trust of Australia (Victoria) (National Trust) is the state's largest community-based heritage advocacy organisation actively working towards conserving and protecting our heritage for future generations to enjoy, representing approximately 16,000 members across Victoria. As Victoria's premier heritage and conservation organisation, the National Trust has an interest in ensuring that a wide range of natural, cultural, social and Indigenous heritage values are protected and respected, contributing to strong, vibrant and prosperous communities.

The National Trust maintains a Heritage Register of Significant Places, including buildings, landscapes, gardens, trees, and public art. Fawkner Park is not included on our Register, however we do maintain a file on the place (G13144). We also have classified a stand of five *Araucaria bidwillii* (Bunya Bunya Pine) (T12296) located on the northern edge of the park (near corner of Toorak Road and Marne Street).

The National Trust notes that the Fawkner Park Master Plan was completed and approved by the City of Melbourne in 2006. It is noted at page 27 of that Master Plan that while ongoing, the specific recommendations of the plan are generally considered to be relevant for about 10 years after adoption by Council. There is a recommendation for the plan to be reviewed in 2016. The National Trust is not aware of any review of this master plan having occurred since 2016.

In 2016 Fawkner Park was added to the Victorian Heritage Register (VHR). This reflects a change in the acknowledgement of the place's cultural heritage significance since the adoption of the 2006 Master Plan. We note that there is not a current Conservation Management Plan prepared for the place. It is therefore unclear to the National Trust how the current permit is informed by a strategic approach to managing the range of heritage values at Fawkner Park.

We submit that any changes to a public park included on the Victorian Heritage Register such as Fawkner Park should be informed by a current and relevant Master Plan or Conservation Management Plan. The National Trust recommends that an updated Conservation Management Plan be prepared for Fawkner Park to guide any future change at the place.

Reference is given in the Heritage Impact Assessment provided with the application (HIA) to the reference in the 2006 Master Plan to the need to upgrade this entrance to Fawkner Park (page 18). However we note that the relocation of basketball court was not considered at that time. We believe that the understanding and documentation of the heritage values of Fawkner Park has significantly changed since the Masterplan was prepared, and we have concerns that the proposed works would adversely impact on the significance of the place.

It is noted that the proposed new location of the basketball court is against the contours of the site, which will therefore require earth works to produce a level playing surface. The new location of the court is further north east of the entrance, and therefore further within the landscaped features of Fawkner Park. The National Trust maintains concerns that this new location is more visually prominent in the landscape, and is out of character with the general landscape character of the park as open green space, avenues of trees, and specimen tree plantings. This aspect of the proposal is not directly addressed within the HIA. While visual improvements to the Pasley Street North entrance to Fawkner Park are desired by the 2006 Master Plan, this should not be to the detriment of the broader landscape character of the park.

The use of Fawkner Park as a sporting location is recognised in the VHR Statement of Significance. The National Trust considers that this is a use that should be supported in the ongoing management of the park. We highlight that sporting use generally throughout the park is on playing fields that are grassed. These features of Fawkner Park are well integrated into the design of the park, being part of the large lawn areas which are divided by established tree lined pathways.

The current proposal seeks to change a lawn area well within the park into a hard surface basketball court, which has a substantially different impact on the heritage significance of the park than other sporting uses. We consider that the current proposal would have a high impact on the visual landscape character of this area of Fawkner Park. It is located close to an avenue planting, which will have a visual impact on the views from that established pathway. Visually it will contrast with the surrounding landscape, due to the change from grass to hard surface, and through the blue colour of that surface. It will also be cutting across the contours of the landscape. We submit that changes to the contour of the site have the potential to change the sloping and treed park landscape character in this area of Fawkner Park.

We recommend further consideration of updating the basketball court in its current location. This would be less intrusive on the park, being located on the edge of the landscape, and would be an extension of its current use. This is more desirable as it avoids the need to replace currently grassed areas of the park with a hard surface. The footprint of the existing court could be well utilised for this upgrade, where the possibility of rotating the court to face north-south could be investigated. This would avoid the need to change a contouring and grassed part of Fawkner Park.

The proposed new paths take a substantially different form compared to the established heritage paths of Fawkner Park, which diagonally cross the park. This change in form of new

pathways in the park is also a break with the valued open landscape character. These new paths will increase the amount of hard surface in this area of the park, which could have an impact on drainage. This is of concern in the context of the need to improve site drainage at this part of the park, and in relation to the nearby significant avenue plantings.

We accept the need for resolving temporary flooding issues, particularly given the high use of this part of the park. However it is unclear to the National Trust why moving the basketball court further into the park is the only option for resolving this issue. This is not a recommendation of the 2015 Cardno Drainage Investigation Report, and no evidence is provided making this recommendation. It is unclear to the National Trust whether works have been done to ensure that the existing drainage pipes are clear and in good condition (as recommended in the Cardno report), or if there have been impacts from other surrounding works on drainage issues (such as the 2015 Water Main Renewal). We would support finding a drainage solution within the park, particularly through a sustainable landscaped design. However we submit that this should not be to the detriment of the established landscape character of the park. The current proposal to move a hard surfaced basketball court within the significant open space of the park has the potential to be a high-impact response to this issue. A landscape response to the drainage issue would also present an opportunity to undertake the desired improvements to the visual aspect of this entrance to the park.

In conclusion, we have concerns regarding the potential high-impact nature of the works proposed in moving a basketball court from the edge of Fawkner Park, to well within the park itself. This is of further concern given it is not a recommendation of any adopted Master Plan or Conservation Management Plan. We request that further consideration is given to upgrading the basketball court within (and possibly extending from) its current location, and that a landscaping solution be pursued to address drainage issues in a way that is less intrusive on this highly valued public park.

Should you have any questions regarding the above, I can be contacted on 9656 9823 or on jessica.hood@nattrust.com.au.

Yours faithfully,

A handwritten signature in cursive script, appearing to read 'Jessica Hood', written in black ink.

Dr Jessica Hood
Community Advocate Environmental Heritage
National Trust of Australia (Victoria)