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News Bulletin - June 2000

(Amended Version)

THREATS TO ROYAL PARK

OUTSIZE LIGHT TOWERS-MONSTER GAMES VILLAGE-CAR INVASION

I STADIUM LIGHT TOWERS

Impact on Melbourne?

Dr Barry Clark, optical consultant and honorary spokesperson for the Royal Park Protection Group (RPPG) and the Astronomical Society of Victoria (ASV), has made a number of predictions about the likely impact of the TV-standard light towers going up on the State Hockey and Netball Centre (SHNC) in Royal Park. This year we have circulated several of his papers on the environmental impact of the stadium lighting detailing the significant and, possibly, damaging impact on the Melbourne Zoo, the Park, surrounding residential areas and the consequences for the City of Melbourne. A brief summary of these forecasts follows:

- Melbourne Zoo and the Park will be flooded with light, possibly up to 7000 times brighter than the animals' natural, dark, night-time environment and so will adversely affect sleep cycles and breeding patterns of Zoo and Park fauna.
- Light trespass will increase in the vicinity of the Royal Children's Hospital and in surrounding residential areas, a potential cause of sleep and other disorders.
- There are 84 species of free flying birds, which fly in and out of the Zoo from Royal Park, plus other species of migratory birds passing through the area. USA experience is that birds tend to become disoriented by lit towers and collide with them or circle them incessantly until they die.
- Lights will cause such glare for car, train and tram drivers near SHNC as to fail the Australian Standard (AS/NZS 1158.1.1) on road lighting and so constitute safety hazards.
- Light pollution in Melbourne has grown by an unprecedentedly large amount (89%) in the past nine years and is now affecting astronomical observations across the whole of Victoria. Its source is outdoor lighting which is also contributing disproportionately to the State's unacceptable growth in greenhouse gas emissions. The outdoor lighting system proposed for the SHNC is certain to cause a significant increase in light pollution because the system fails to comply with key provisions of the relevant Australian Standard (AS 4282-1997), Control of the Obtrusive Effects of Outdoor Lighting.

Parkland is valuable, and greedy eyes see the money in it. So you must always be on the alert. Hang on to your breathing spaces in this developing and already over-congested city. Protect your parks from the pressure of political concrete.
Patrick White at Save Centennial Park Rally Sydney June 1972

Thwaites gives Green Light to Stadium Lights:

As some members will be aware, last March Minister Thwaites commissioned an "independent peer review" which was set up by the Department of Infrastructure and undertaken by NDY Lighting Design Pty Ltd - a commercial lighting company. On the strength of this review, Minister Thwaites has "done a Maclellan" and amended the Melbourne Planning Scheme (C26). This is seen by many as a cynical exercise designed to force through construction of light towers on the SHNC, thus bypassing genuine, community concerns about environmental damage and dispensing with the need for an environmental impact assessment. (Neither the hockey stadium lights nor the outdoor netball court lights had planning permits, hence the need for Government intervention.) Apparently the whole complex has to be ready, TV-standard light towers included, for Olympic teams to practice prior to the Sydney Games in September!

Thwaites Announces Results of "Peer Review":

Minister Thwaites' letter to RPPG of 5 May 2000, communicating the findings of the peer review and announcing Amendment C26 to the Planning Scheme, stated: *"I believe that based on the conclusions of NDY Light Pty Ltd report, there will be no additional light spill at the Zoo boundary wall above and beyond the effects of the original lighting system which has been in place for many years..."*. Note that the original lighting system is not currently in place, it was removed in April 1999 when the old State Hockey Centre was demolished! The NDY review deals only with direct light spill from the proposed hockey lights. The Minister, however, extends the conclusions of the review to validate all the sports facility lighting not just the hockey stadium lighting.

Minister Garbutt (Environment and Conservation), however, goes further in reassuring RPPG members that all is well. In her letters she says:..."*the consultant's report found that the proposed lighting for the new Royal Park Hockey and Netball Centre will in fact reduce light spillage on the Zoo boundary. The concerns raised by the community about the possible impacts on the animals in the Zoo have been thoroughly investigated and found to be unjustified.*" We are unaware of any such thorough investigation, and the statement contradicts previous concerns raised by the Zoo about the effects of excessive stadium lighting on animals.

The NDY Lighting Design Pty Ltd report is, unfortunately, the current basis for advice to Government on the lighting structures in the State Hockey and Netball Centre and is the justification for Amendment C26. The report concludes that "...the environment surrounding the State Netball and Hockey Centre will not be affected above and beyond the effects of the original system in the physical training and club competition modes of operation." (Reference Executive Summary Section 2.2 of the Report) This is an erroneous conclusion which appears to have misled both Minister Thwaites and Minister Garbutt.

RPPG June Meeting

Members are asked to support RPPG and attend the June meeting which is to be held at 7:30 pm Monday 27 June 2000 at the North Melbourne Library.

“Peer Review” of Lighting Structures Discredited:

RPPG rejects the NDY peer review of the SHNC hockey stadium lights as follows:

- The review’s terms of reference were so extremely narrow as to preclude an extensive review and the time for completion so limited that the conclusions of the report cannot be accepted. NDY reviewers were initially given only six (6) working days to complete their project. (An extension of a week or so was later given).
- It excluded consideration of extensive technical input by Dr Barry Clark.
- Its terms of reference precluded any consideration of environmental issues which RPPG plus other community groups, trade unions and the City of Melbourne have been requesting for over two years.
- The reviewer failed to consult major “stakeholders” – RPPG, ASV and the Melbourne City Council.
- The reviewer failed to consider the impact of the new outdoor netball court light towers (located directly adjacent to the Zoo) or any other outside lighting structures in the complex.
- The report admits that the lighting designers had no records of the old State Hockey Centre lighting. This appears to invalidate claims that the old lighting could be compared with the new Hockey and Netball stadium lighting. (RPPG has, however, records, data and photos of the old Hockey Centre lighting but the organisation was not consulted.)
- The report fails to point out the greatly increased lighting for the new stadium complex which will have a total, at least, of 192 outdoor lights (individual lights on light towers) compared to 32 for the old Hockey Centre. In addition, the new lights will be switched on for a total of 922 hours per year including for dawn training sessions, as well as night TV telecast games, compared to our estimate of 156 hours for the old Hockey Centre.
- The report contains numerous unjustified assertions, major errors of fact and omission. It is devoid of numerical quantities that are necessary to back up its assertions. It gives no measurements of technical quantities, such as the growing ambient light levels at the Zoo and in Royal Park, which add to the total effect of the new lighting.
- The report omits to point out that the proposed lighting system is far from “world’s best practice” in terms of physical shielding of spill light that causes light trespass and light pollution. Furthermore, it claims that the proposed lighting complies with the relevant standards but the statement is erroneous and the list of standards is incomplete.

Victorian Government Audit Review: RPPG made a submission to the Audit Review on the SHNC contracts. Although the review has been wound up, Parliament has asked the Auditor-General to continue investigations into SHNC. RPPG proposes to make further submissions to the Auditor-General.

Media Campaign

RPPG Members - keep writing to the Premier and Ministers! Ask (1) that the lighting structures on the SHNC be redesigned to avoid the current design problems and request, as before, an environmental impact assessment. And (2) ask that the Royal Park Psychiatric Hospital be saved and that another location be found for the Village (see below)

Solutions:

Dr Barry Clark has spelt out some (what might be construed as impractical) solutions, given that construction of the light towers according to the proposed lighting design, appears to be proceeding. These suggestions are:

- Close the entire Melbourne Zoo and/or move the animals to Werribee or Healesville for protection - doubtless an extremely unpopular solution with the public!
- Construct a 31-metre high perimeter wall around the outdoor hockey pitches and a lower one around the outdoor netball courts and completely roof them all to confine all spill light. This might help to protect the Zoo but would be rather costly.
- Given the importance of sporting events to Victoria and as hockey games have to be staged at night, a number of measures might be necessary when the lights are switched on. These are: cancel the West Coburg line trams and the Upfield line trains, close the north-bound lanes of the Flemington section of City Link and halt Elliott Avenue traffic, given potential traffic hazards from the glare of the SHNC lighting.

The point is that it would obviously be far better simply to modify the lighting design instead. There are several practical and economical solutions, most of them already in use around Melbourne. The Ministers need to realise that they have been misled and demand a redesign of SHNC lighting.

II GAMES VILLAGE

RPPG had accepted the assurances of Minister Pandazopoulos (Major Events) that no decision would be made until the reports of two feasibility studies had been received - the 2006 Commonwealth Games Village Feasibility Study for the Royal Park Psychiatric Hospital site and another feasibility study on the Docklands option. Members were stunned to hear media reports during the last week of May that Minister Pandazopoulos' media spokesperson had announced that the Government would hand over the land for private development of the athletes' village. Also concerning were quotes from Mr Ron Walker (now confirmed as Chair of the 2006 Commonwealth Games Board) as follows: "I believe I have an understanding with the Premier that Parkville is the preferred site" (The Age 21 May 2000). The Premier has, however, confirmed that a decision is yet to be made by Cabinet on the location of the Village. ALP "Greener Cities" policy, announced before the election, confirms that all major projects subject to a Cabinet decision are required to have an environmental impact assessment. The Bracks Government needs reminding of this promise.

III CAR INVASION

Alarming reports are being received that the State Centres Trust and staff members of the Melbourne City Council are already making advance arrangements for Royal Park to accommodate the extraordinary number of cars expected at events at the SHNC. No mention has been made of examining public transport options and alternatives such as opening up nearby commercial carparks. Alternative modes of transport have been well and truly canvassed by the City of Melbourne in relation to Yarra Park and by the AFL in relation to Colonial Stadium. Members are urged to apply pressure to Melbourne City Councillors and Ministers to adopt solutions for Royal Park tried out for other venues. RPPG will raise the question with State Centres Trust Advisory Committee.

RPPG is also fighting proposals by sporting groups using Brens Pavilion on Macarthur Road for more carparking! There is considerable resistance by sportspersons to parking in the nearby Zoo carparks or in The Avenue and walking the short distance to Brens Pavilion. At least the City of Melbourne appear to have dropped the proposal to fell fourteen trees to clear the way for carparking and an access road from The Avenue - thus saving five mature elms plus Red River gums forming part of an historic avenue.