

Royal Park Protection Group



Royal Park Protection Group Inc

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Dear Sir/Madam

RE: OBJECTION TO PLANNING PERMIT APPLICATION TP-2019-924 FLOODLIGHTS AND WORKS AT MELBOURNE ZOO, ELLIOTT AVE, PARKVILLE

The Royal Park Protection Group (RPPG) objects to granting an application for floodlights at the Melbourne Zoo. The Royal Park is intended to be a “dark park” and safety of personnel can be managed in far less intrusive manner.

Background

RPPG wrote in support of the Friends of Royal Park objection in October 2019.

Current floodlights proposal

Eleven roofline floodlights are installed around two sides of the building (eastern, southern, including indented SE side) replacing the earlier illegally installed 150W floodlights. The present floodlights are 50W LED and vertically point downwards.

Australian Standards

Australian Standards (AS/NZS 1158.3.1:2010, AS/NZS 4282:2019) are applicable to the Zoo floodlighting proposal, however, as AS1158 is specifically for roads and public spaces it is less so. This is important in this context as AS1158 allows much greater light spill than AS4282. Key to this application is the use of lighting in an environmental zone and the impact on protected dark environments.

The current lighting is:

- Too bright! (floodlights are 50W LED).
- Has excessive reflected light off the walls of the building.
- Is widely visible in the park.
- Has not assessed the environmental impacts on Royal Park.
- Has not considered the “special significance” of the site, ie Royal Park.

Policies and Strategies

The City of Melbourne Public Lighting Strategy 2021, Section 4.5.8 specifically refers to Royal Park, as the city's only 'wild' park, a 'dark space' and to light only the major pathways and reduce the extent of illumination after 1am as well as minimising stray light from surrounding buildings. It also states that intrusive outdoor lighting can have a negative effect on animals etc.

The Royal Park Master Plan 1998 has an objective to "encourage Royal Park's role as part of a wider open space wildlife network".

Nature in the City – Thriving Biodiversity and Healthy Ecosystems 2017 cites threats to biodiversity as including "artificial light at night which affects both biodiversity and human health and wellbeing".

The Zoo floodlights as proposed are not consistent with these objectives.

Floodlights create safety risk

The floodlights can actually **create** a pedestrian safety risk:

- the floodlights along the southern side of the building cause the footpath to be cast in dark shadow, defeating any attempt to provide safe movement for Zoos Victoria Corporate Office staff and visitors and causing a very unsafe situation for other park users.
- It has been reported that Monash University's XYX Lab, girls' equality charity Plan International Australia, and ARUP lighting analysed 84 hotspots identified by Melbourne women as unsafe. Their findings showed that sites with **higher light levels** were more likely to be perceived as **unsafe**. See: <https://www.theage.com.au/national/victoria/how-can-melbourne-be-made-safer-for-women-ask-them-20191207-p53htu.html>

Need for the Floodlights

The proposal for floodlighting appears to be an overreaction to the issue.

For example dedicated spaces could be made available for female staff adjacent to Gate 4 so that there is no need to light the wall area leading to Gate 5.

Also, before proposing such invasive lighting surely questions such as the following need to be asked:

- How many staff and visitors enter/exit the building after dark?
- On how many days does this occur?

We note that there is an existing system of Council park lighting around the Zoo perimeter, including the footpath alongside Gate 4 and the Zoos Victoria Corporate Office. The public lighting is obviously adequate for after-hours visitors (and staff) observed

Options

It is disappointing that no controls for the operation of these lights have been proposed. This seems an oversight given the limited need for "extra lighting".

Provision of a 'safe, well-lit walking path' could easily be met by adapting the existing City of Melbourne park lights along the footpath at Gate 4 and perhaps by considering outside the Zoos Victoria Corporate Office:

- inclusion of movement sensors
- increase in brightness and illumination when movement triggered, sufficient in time to allow staff/visitors to safely walk to/from their vehicles
- reversion to present park lighting setting at all other times in keeping Royal Park 'dark space' lighting parameters

It is also suggested that the designers look at the use of "dim" full-cutoff sensor-switched blue-poor lighting mounted much lower down on the building wall.

This type of lighting would limit the negative effects of the proposal markedly.

RPPG hopes that the above comments will support the rejection of this application and trigger a review of other options to guarantee the safety of staff and visitors to the Zoo whilst maintaining the preservation of our Park.

Regards

Paul Leitinger

Convenor – Royal Park Protection Group