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Dandenong Police Paddocks Reserve/Nerre Nerre Warrene, Bunurong Country. JORDAN CROOK

**SUBMISSION TO**

# *Dandenong Police Paddocks Reserve/Nerre Nerre Warrene Master Plan*

**Victorian National Parks Association**

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## **Submission to Dandenong Police Paddocks Reserve/Nerre Nerre Warrene Master Plan**

Due: 28 September 2023

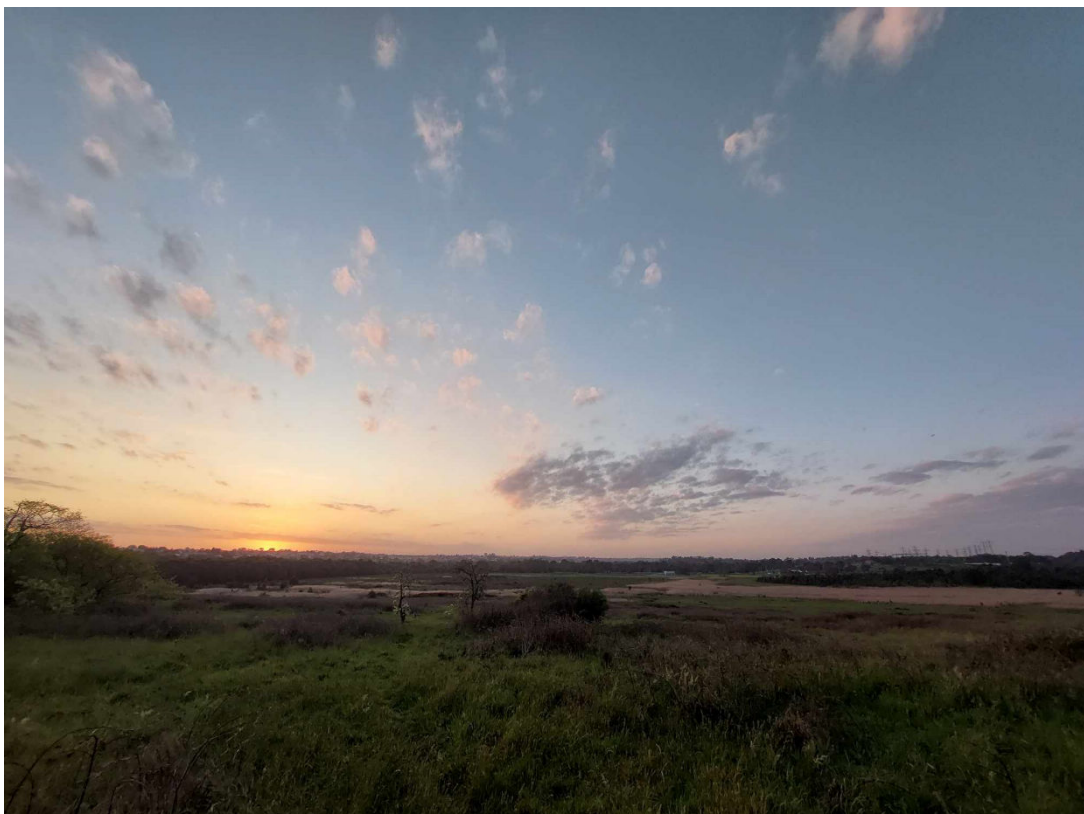
Thank you for inviting submissions into the Dandenong Police Paddocks Reserve/Nerre Nerre Warrene Master Plan.

Victorian National Parks Association (VNPA) is Victoria's leading nature conservation organisation. We are an independent, non-profit, membership-based group, which exists to support better protection and management of Victoria's biodiversity and natural heritage. We aim to achieve our vision by facilitating strategic campaigns and education programs, developing policies, undertaking hands-on conservation work, and by running bushwalking and outdoor activity programs which promote the care and enjoyment of Victoria's natural environment.

The Dandenong Police Paddocks are a pivotal part of the corridor of natural vegetation and green spaces leading from the heavily urbanised suburbs of Dandenong up to the Dandenong Ranges. They allow animals such as Powerful Owl and Grey Headed Flying Fox to move through the landscape safely and help the movement of genetic information of plants and animals.

The corridor, of which the Police Paddocks are a vital part, provides much needed respite from the surrounding urban environment that is dominated by asphalt and cement, with the beautiful stands of Yellow Box woodlands and open green space.

We acknowledge that the Reserve is on the lands of the Bunurong people, who called the place Nerre Nerre Warrene and honour their continuing connection to and caring for Country. We support Traditional Owner joint-management of parks and public land for conservation of natural and cultural heritage.



## Process

The information provided on the Engage Victoria Dandenong Police Paddocks Reserve Master Plan ('the 1999 Plan') website does not make clear if the survey and map input will feed in directly to a Future Directions Plan such as the one for the site that already exists, the Dandenong Police Paddocks Reserve Future Directions Plan (Parks Victoria, 1999).

Although the 1999 Plan is dated in some sense, much of it is still very much relevant and provides a great guide for this current process. An updating of this document instead of re-writing the document as a whole is supported.

It is disappointing that the use of the map input function is also being used without context of the Reserve's management zones and heritage listing requirements. The use of such a map with no management or values context can lead the public to get their hopes up when certain activities are not permitted in certain areas due to the values and legislation that protects them.

The 1999 Plan makes very clear in its vision that park (2.1 Vision, the 1999 Plan) use and 'any new building and infrastructure will be designed to consolidate a rural bushland theme with reference to the Reserves history'<sup>1</sup>.

This is further reflected in the official vision of the 1999 Plan which states:

Dandenong Police Paddocks Reserve: a spiritual and historic place in which people can experience cultural and natural environments and undertake recreational pursuits in a quality rural setting.

VNPA supports the retention of the original vision and believes this should be made public on the Engage Victoria website and in future engagement with the public on the process.

The use of the map input function on the Engage Victoria website should also be in line with section 2.2, 'The role of the Reserve', in the 1999 Plan which states:

Groups who have been long term users of the Police Paddocks will be encouraged to undertake complementary management to ensure that the Reserve's cultural, landscape and habitat values are protected.

Much of the Police Paddocks Reserve is listed under the Victorian Heritage Register as Nerre Nerre Warren (Victorian Heritage Register Number: H2348)<sup>2</sup>, see Map 1 of the listed heritage area.

These values were not made clear to those making a submission.

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<sup>1</sup> Dandenong Police Paddocks Reserve Future Directions Plan, Parks Victoria (1999).

<sup>2</sup> NERRE NERRE WARREN, CHURCHILL PARK DRIVE ENDEAVOUR HILLS, CASEY CITY. Heritage Council Victoria website, viewed 25 September 2023- <https://vhd.heritagecouncil.vic.gov.au/places/13456#statement-significance>





Map 1. Nerre Nerre Warren (VHR Number H2348) heritage landscape.

## Tenure of reserve

It is understood that the Reserve was permanently reserved for public use in July 1930 under the then *Narre Warren Act 1930* but now sits under the *Crown Lands (Reserves) Act 1978* with Parks Victoria as the sole manager of the site from July 1998.

It has been proposed (3. Reserve Wide Strategies. p. 9, Parks Victoria 1999) that the Reserve's name be changed to further engage surrounding community and restore a oneness to the Reserve. An action was flagged in the 1999 Plan to 'investigate changing the name from Dandenong Police Paddocks Reserve to Dandenong Police Paddocks Parklands<sup>3</sup>'.

The Metropolitan Melbourne Investigation Discussion Paper (VEAC 2010) specifically mentions Police Paddocks as a Regional Park, as seen in Table 1.

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<sup>3</sup> Page 9. Dandenong Police Paddocks Reserve Future Directions Plan, Parks Victoria (1999).

NAME	AREA (HA)	RESERVATION TYPE OR PURPOSE OR ACCEPTED LCC RECOMMENDATION
<b>Regional park</b>		
Kurth Kiln Regional Park	1247.2	Public purposes LCC 1994- Regional Park
Lysterfield Park	655.4	National Parks Act- Schedule 3 LCC 1994- Regional Park
Woodlands Historic Park	820.8	National Parks Act- Schedule 3 LCC 1987- Regional Park
Police Paddocks	418.4	Public purposes (1930)

Table 1. Regional Parks in the investigation area (Table 4.5, Page 74, VEAC 2010)

VEAC considered the categorisation of Metropolitan Park to be a more useful land use category for the lands, in acknowledgement of the different range of activities in these parks and the generally more modified environment including Police Paddocks Reserve<sup>4</sup>. VEAC states that:

Metropolitan parks, like regional parks, provide open space for recreation in natural or semi-natural environments; however metropolitan parks may also include areas of highly modified open space. Their landscapes range from areas of bushland to revegetated areas, landscaped areas similar to parklands and gardens, sports ovals and former farmland – potentially within one park. (p72 VEAC 2011).

The Recommendation for metropolitan parks, is found in Table 2.

RECOMMENDATION	
<p><b>D General recommendations for metropolitan parks</b></p> <p>Metropolitan parks as shown on map A and listed in appendix 5:</p> <p>(a) be used to:</p> <ul style="list-style-type: none"> <li>(i) provide for informal recreation for large numbers of people associated with enjoyment of natural or semi-natural surroundings or open space</li> <li>(ii) conserve and protect natural landscapes and scenic values and open space</li> <li>(iii) provide for organised recreation to the extent that is consistent with (i) and (ii) above and according to the specific characteristics of each park</li> <li>(iv) conserve and protect biodiversity to the extent that is consistent with (i) above; and</li> </ul>	<ul style="list-style-type: none"> <li>(v) protect significant cultural and historic sites, landscapes and places, including Aboriginal cultural sites and places;</li> <li>(b) include unused road reserves adjoining parks, where appropriate;</li> <li>(c) have a management plan prepared for each park in partnership with key user groups, local authorities and the community; and</li> <li>(d) be permanently reserved under the <i>Crown Land (Reserves) Act 1978</i> for the purpose of metropolitan park if not already appropriately reserved (see note 2).</li> </ul> <p><b>Notes:</b></p> <ol style="list-style-type: none"> <li>1. Implementation of accepted recommendations should allow flexibility for minor boundary adjustments.</li> <li>2. This recommendation requires that the <i>Crown Land (Reserves) Act 1978</i> be amended to create a new provision and schedule for metropolitan parks similar to that of existing section 47B.</li> </ol>

Table 2. VEAC Recommendation for metropolitan parks (VEAC 2011) p79

<sup>4</sup> Metropolitan Melbourne Investigation. FINAL REPORT, Victorian Environmental Assessment Council (VEAC) August 2011

Recommendation 3 (R3) of the 2011 VEAC report is:

intended to provide a legislative mechanism to match these to recommended public land use categories and purposes when these are legislated, without the need to individually re-reserve areas. It will also address some administrative complexities and inconsistencies that arise when the reservation purpose does not reflect specific wording in legislation relating to, for example, Crown land leases.<sup>5</sup>

The recommendation is in Table 3.

Recommendation	
R3	The Crown Land (Reserves) Act be amended to align the 1300 or so historical reservation purposes to the purposes of the revised public land use categories through a schedule that replaces them with the purposes of the relevant category.

Table 3. Recommendation 3 (VEAC 2011)

The Statewide Assessment of Public Land Discussion Paper (VEAC 2016) discussed merging Regional and Metropolitan Parks into 'Recreation Parks'. In the Final Assessment (VEAC 2017), after further consideration VEAC found that 'they (Metro Parks) are more usefully treated as a separate land use category, in acknowledgement of the different range of activities in these parks and the generally more modified environment<sup>6</sup> as well as presence of high natural values such as remnant vegetation<sup>7</sup>.'

It was found that the Crown Land (Reserves) Act 1978 in particular contained several features that are barriers to timely implementation of VEAC recommendations and simplification of land tenure arrangements<sup>8</sup>.

Final Report (VEAC 2017) recognised Metropolitan Parks under the Regional Park category as shown in Table 4.

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<sup>5</sup> Statewide Assessment of Public Land Final Report, Victorian Environmental Assessment Council (VEAC), May 2017

<sup>6</sup> P78 20

<sup>7</sup> Statewide Assessment of Public Land Final Report, Victorian Environmental Assessment Council (VEAC), May 2017

<sup>8</sup> Victorian Government Response to the Victorian Environmental Assessment Council's Statewide Assessment of Public Land. Final Report, Department of Environment, Land, Water and Planning 2016

Revised public land classification (\*denotes protected area)

Category and description	Purpose (or object)
<b>Terrestrial</b>	
<p><b>4. Regional park</b>            Extensive areas of natural or semi-natural land close to population centres or major tourist routes or easily accessible            Includes most parks in schedule 3 of the National Parks Act not included in conservation park above, and regional, metropolitan and forest parks            (see note 3)</p>	<p>To provide opportunities for informal recreation for large numbers of people associated with the enjoyment of natural or semi-natural surroundings or semi-natural open space            to protect natural and semi-natural landscapes and scenic values            to protect natural biodiversity to the extent consistent with the above            to protect the rights and interests of Traditional Owners, native title holders and Aboriginal Victorians, and their cultural values            to provide for minor resource extraction not incompatible with all of the above, excluding sawlog and pulpwood harvesting</p>

Table 4. Revised public land classification from Statewide Assessment of Public Land Final Report, Victorian Environmental Assessment Council (VEAC), May 2017

The government accepted in full, in principle or in part, all of VEAC's 30 recommendations from VEAC's 2017 report, these included recommendations around Metropolitan Parks and the Crown Land (Reserves) Act 1978. These Recommendation are:

**R3. Align 1300 historical Crown land reservation purposes.**

The Crown Land (Reserves) Act be amended to align the 1300 or so historical reservation purposes to the purposes of the revised public land use categories through a schedule that replaces them with the purposes of the relevant category.

**The government accepts this recommendation in principle.**

**R6. New public land legislation.**

Within five years, a new public land Act be developed to replace the current Land Act, Crown Land (Reserves) Act and Forests Act.

NOTE: Provisions in the Forests Act relating to public land management across land tenures such as those relating to fire could be included in the new Act or another suitable Act such as the *Conservation, Forests and Land Act 1987*.

**The government accepts this recommendation.**

**R9. Remove distinction between permanent and temporary reservation.**

The Crown Land (Reserves) Act be amended to remove the distinction between temporary and permanent reservation, retaining a parliamentary role for revocations of land in revised categories of nature reserves, bushland reserves, regional parks and coastal reserves.

**The government accepts this recommendation.**



The park is an important heritage site and ecologically critical to the region, including a raft of state and Commonwealth listed species and depleted and endangered Ecological Vegetation Classes as well as other native wildlife species. We believe the park's tenure should match the culturally and ecological importance instead of languishing on the *Crownlands (Reserves) Act*.

With changes to public land legislation into a planned Public Land Act and revised National Parks Act, VNPA would encourage a discussion on the change of land tenures for areas of the Reserve to reflect the cultural and ecological values as well as the high density of single user and sport infrastructure.

VNPA proposes that the Traditional Owners of the area make the final call for the area now known as Narrandjeri Wurundjeri Historic Zone.

Consideration of a change of Narrandjeri Wurundjeri Historic Zone areas tenure to a Cultural Park could be an option. This tenure was suggested in the *Future Use and Management of the Mirboo North and Strathbogie Ranges Immediate Protection Areas: Recommendations of the Eminent Panel for Community Engagement Final Report (DELWP 2022)*

The Eminent Panel suggested the following management purposes for the Cultural Reserve<sup>9</sup>:

The Panel recommends that this involves:

3.1 Enabling the following management purposes, while the Cultural Reserve category is finalised and legislated:

- a. Maintain, restore and heal Country and its cultural landscapes, protect Traditional Owners' biocultural values and knowledge and Traditional Owners' rights and interests in and connections to Country
- b. Restore, protect and enhance cultural values associated with features, landscapes, culturally significant species, spiritual associations and kinship relationships
- c. Protect the natural and biocultural values, including biodiversity and biocultural diversity
- d. Provide for sustainable use of natural resources where consistent with the purposes above
- e. Provide for active management to heal and care for Country through the application of Traditional Owner knowledge and practice as well as contemporary conservation and land management practices
- f. Provide opportunities for recreation associated with the enjoyment of nature, and education, where consistent with the purposes above.

VNPA believes this tenure is a good fit for the Narrandjeri Wurundjeri Historic Zone if that suits the Bunurong people and their aspirations for Country.

Areas zoned as Conservation and areas to complete connectivity for wildlife movement, such as on Figure 3 Zoning Dandenong Police Paddocks of the 1999 Plan, should be added to

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<sup>9</sup> Future Use and Management of the Mirboo North and Strathbogie Ranges Immediate Protection Areas: Recommendations of the Eminent Panel for Community Engagement Final Report, Department of Environment, Land, Water and Planning 2022.



Lysterfield Park managed under the *National Parks Act*, with areas outside of the proposed Cultural Reserve Area co-managed with Bunurong Traditional Owners as a Greater Lysterfield Park.

## **An imbalance in uses**

The importance of the Dandenong Police Paddocks Reserve can not be understated in terms of accessible green space for surrounding suburbia and as corridor for wildlife.

This must be reflected in the tenure and management of the land.

The imbalance between areas designated for sporting and single groups uses was highlighted in the 1999 Plan, with the golf course alone being the size of 79.8 ha.

There are two golf courses within kilometres of each other, within and beside the Reserve.

Many land managers are having a conversation about repurposing golf courses<sup>10</sup> to accommodate more of the public in the use of such large areas of public land and to reverse declines in biodiversity<sup>11</sup>. This is a conversation that should be facilitated by this Master Plan, including the restoring of natural vegetation from once-cleared areas.<sup>12</sup>

Parks Victoria should ensure that no further allocation of public open space for exclusive use such as sporting or single user groups occurs as part of this Master Plan. This was a strategy of the 1999 Plan under 3.1 Reserve Identity.

If new infrastructure, sporting areas, dog parks and tracks are to be installed these must be placed in areas away from native vegetation and habitat, in areas of already cleared native vegetation and in line with the Reserve's identity. One suggestion for this would be part of the golf course site that is already heavily cleared and altered.

Any further loss of native vegetation within the Reserve area is unacceptable. As shown in Map 2, most of the Ecological Vegetation Classes (EVCs) within the Reserve are listed as Endangered, Vulnerable or Depleted in the two bioregions represented: Gippsland Plain and Highlands-Southern Fall.

Any tracks and infrastructure within the Tree Protection Zone (TPZ) of existing trees on the site will likely lead to their death in the long term, and must be avoided.

Planning must incorporate the Australian Standards Protection of Trees on Development Sites (AS4970 2009) and exclude activity from the TPZ area of existing trees.

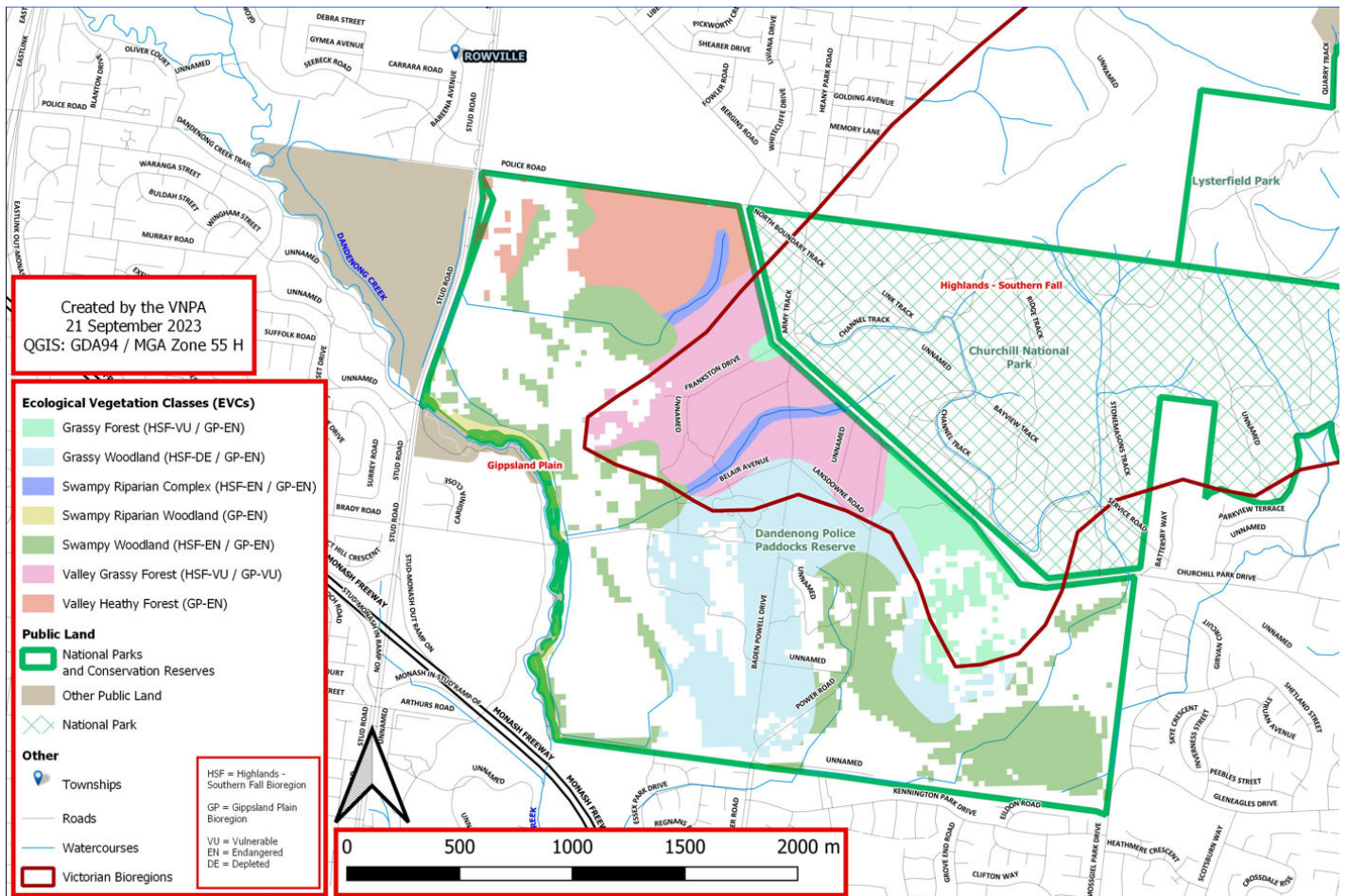
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<sup>10</sup> Dogs on the greens, flying golf balls and no set course for a fair way, The Age, viewed 18 September 2023. <https://www.theage.com.au/politics/victoria/dogs-on-the-greens-flying-golf-balls-and-no-set-course-for-a-fair-way-20230322-p5cudn.html>

<sup>11</sup> Transformation of former inner-Melbourne golf course to nature reserve begins, LandscapeAustralia Editorial, viewed 18 September <https://landscapeaustralia.com/articles/construction-begins-on-elsternwick-park-nature-reserve/>

<sup>12</sup> Rewilding a golf course, CNN. Viewed 18 September 2023. <https://edition.cnn.com/videos/tv/2023/08/22/ohio-golf-course-rewilding-c2e-spc-intl.cnn>

The 1999 Plan raised a possible name change, but a change in tenure can help to further bed down management and use of areas, raise the profile of the Reserve, increase protection for cultural heritage and biodiversity values, and increase the stewardship from the community needed for this important area.



## Care and management not just built infrastructure

The investment into the Police Paddocks Reserve is much welcomed. The \$5.5 million<sup>13</sup> is a significant investment into the park and can go a long way in ensuring the parks ecological and cultural heritage integrity.

We note the media release<sup>14</sup> stated that the 'final plan will incorporate equestrian trails, all ability access and connectivity for the community'. As well as creating access to the nearby sports precinct, it will improve public safety with lighting and proposals whilst acknowledging the cultural and historic significance of the area.

<sup>13</sup> Media Release. Revitalising Dandenong's Historic Police Paddocks, Premier of Victoria. 27 May 2022

<sup>14</sup> Media Release. Revitalising Dandenong's Historic Police Paddocks, Premier of Victoria. 27 May 2022

Parks Victoria must ensure that no further allocation of public open space for exclusive use such as sporting or single user groups does not occur as part of this Master Plan. This was a Strategy of the 1999 Plan under 3.1 Reserve Identity. Increased management is extremely warranted for the ecological and cultural heritage of the Reserve. This must be an outcome of this investment.

The skew of Parks Victoria in the past, of increased infrastructure over management of pest plants and animals, stormwater mitigation, surveying of natural and cultural values and compliance of management of listed cultural heritage site has been very disappointing.

Many of the known heritage sites listed within the Reserve area are heavily impacted by invasive species, both rabbits and blue periwinkle, and that is damaging the fabric of the sites. The growing impact of invasive plants and animals on heritage sites on the site is both concerning and disappointing. Many of those species listed under the *Catchment and Land Protection Act 1994* and Weeds of National Significance (WONS) list of invasive species.

Hectares of blackberries, gorse, watsonia and grassy weeds cover the Reserve, severely impacting local biodiversity in areas of remnant vegetation. But they do play a role as habitat for small insect eating birds, insects and small mammals in areas that were formally cleared paddocks. The weeds in cleared areas should be removed slowly while being replaced with indigenous plant species that align with the local EVC and a focus on removing weeds from areas of native vegetation must be prioritised.

Images of weed infestations are shown below, as taken on 26 September 2023.



Picture 1. Bulbil Watsonia (*Watsonia meriana* var. *bulbillifera*) infestations take over hectares of the Reserve and impacting on remnant vegetation





Picture 2. Blue Periwinkle (*Vinca major*) infestations likely from past historical homesteads cover hectares of heritage sites and bushland areas

### **Compliance and rubbish dumping**

Due to the proximity the Reserve to suburbia, and a lack of compliance activities by Parks Victoria, it is heavily impacted from many illegal activities such as illegal mountain bike tracks clearing native vegetation, illegal firewood poaching and dumping of rubbish.

The lack of compliance activities by Parks Victoria is likely lead by a lack of adequate funding for more rangers and compliance officers but is made further worse by poor signage and understanding of the lands importance. Dumped rubbish and waste is common across the Reserve and increases the spread of invasive plants through dumped green waste. It causes harm to Parks Victoria staff and the public when waste is dumped.

Pictures below were taken around the Brady Road entrance to the Reserve on 26 Sep 2023.



Although signs are found around the Reserve to 'Dob in a Dumper' the signs are small and rely on the public to undertake compliance activities.

There is a strong need to instal cameras in areas of high dumping risk to not only deter dumping but to prosecute those doing the dumping. Many of these sites of dumped waste are of commercial quantity.

Increased compliance, monitoring and on the ground contact with Parks Victoria staff in the Reserve will see the public better understand the Reserve is cared for and managed and help engage those people looking to understand more about the Reserve and what they can do to help look after it.

### **Recommended and needed works for the Police Paddocks Reserves**

- **Rope bridges** from Churchill national park to Police Paddocks to facilitate the movement of regionally significant species such Sugar Glider.
- **Removal of unwanted infrastructure** from past Jamborees (p. 15, the Plan 1999)
- **Publishing of ParkNote** on Parks Victoria website and at entry points to the Reserve.
- There is a strong need for better and **more prominent interpretive signage** which will allow the public to understand the historical and ecological context of the Reserve. Only one sign was found upon inspection, as shown below.
- Maintaining the connection of native vegetation within the Reserve by **revegetation along Dandenong Creek**. Increase the width of the current vegetation along the creek edge.
- **Ongoing management of pest plants and animals** within the site. Removal of all CaLP Act and WoNS listed species and other environmental weeds.
- **Removal and management of rabbit warrens** from heritage sites and restoration of damage done by rabbits to maintain fabric of the site, investigate rabbit proof fencing to protect sites.
- **Surveying and monitoring** of cultural and biodiversity values within the Reserve area, VBA data is scares but shows the reveere hold many state and Commonwealth listed plant and animal species. See more in Maps 3 and 4.
- **Installation of cameras** in areas of high risk of rubbish dumping as well as increased surveillance of these areas.
- **Increased Ranger presence** at the Reserve for public engagement, compliance and better management.



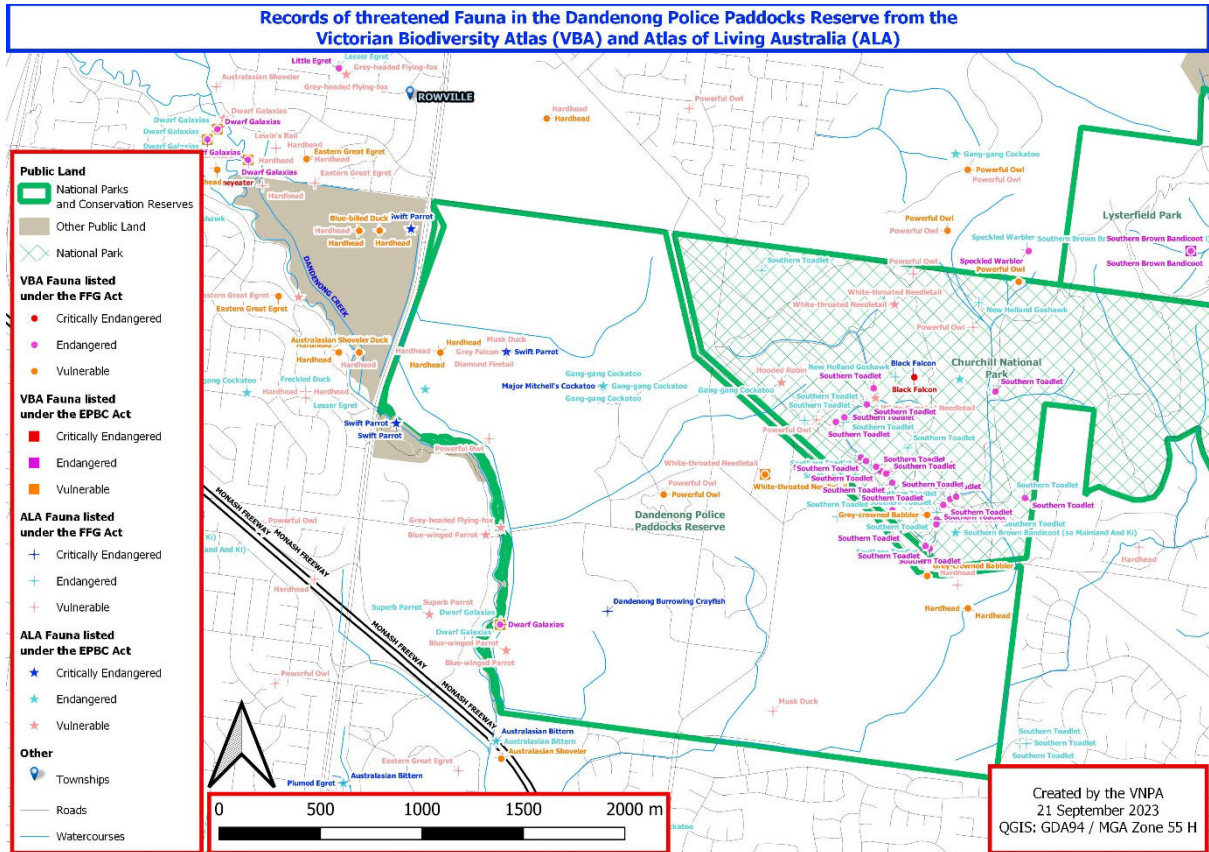


For more information, please contact Jordan Crook, Parks and Nature Campaigner, Victorian National Parks Association, [jordan@vnpa.org.au](mailto:jordan@vnpa.org.au)

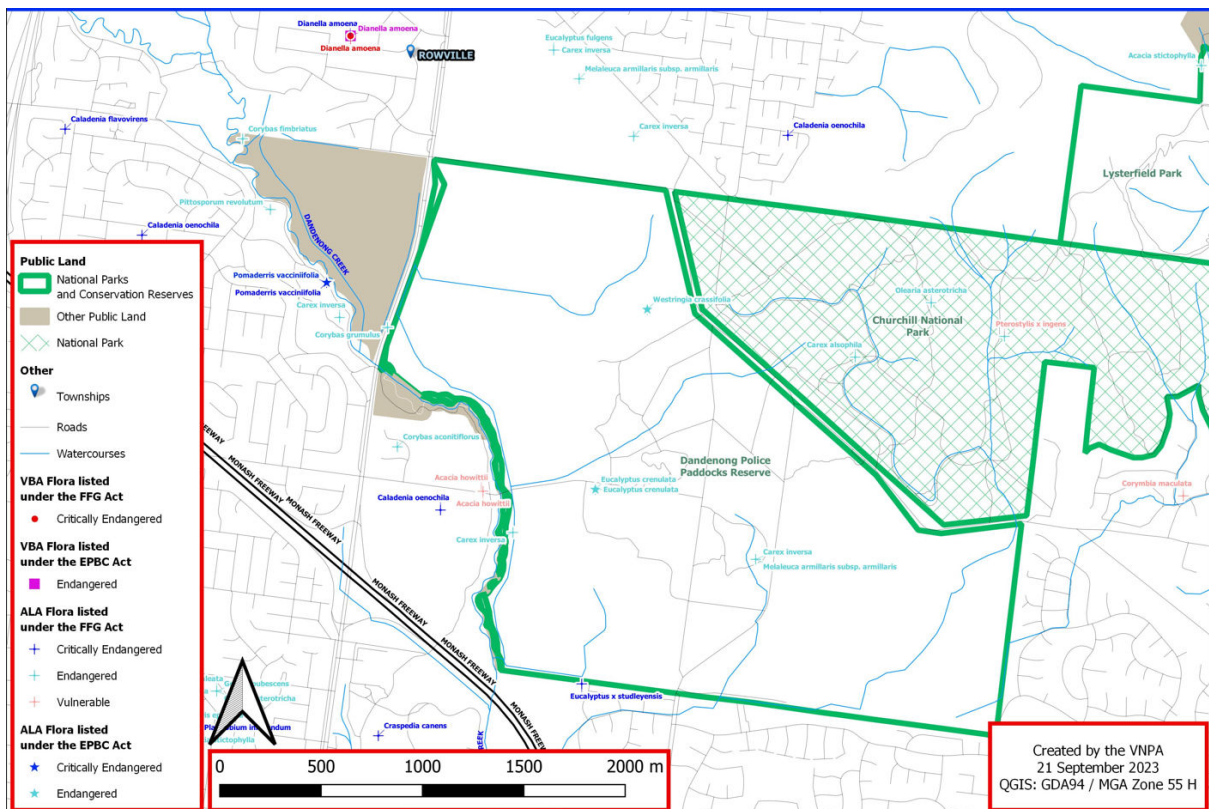


Produced in conjunction with First Friends of Dandenong Creek Inc.





Map 3. Records of State and Commonwealth listed Wildlife species within the Reserve



Map 4. Records of State and Commonwealth listed plant life within the Reserve