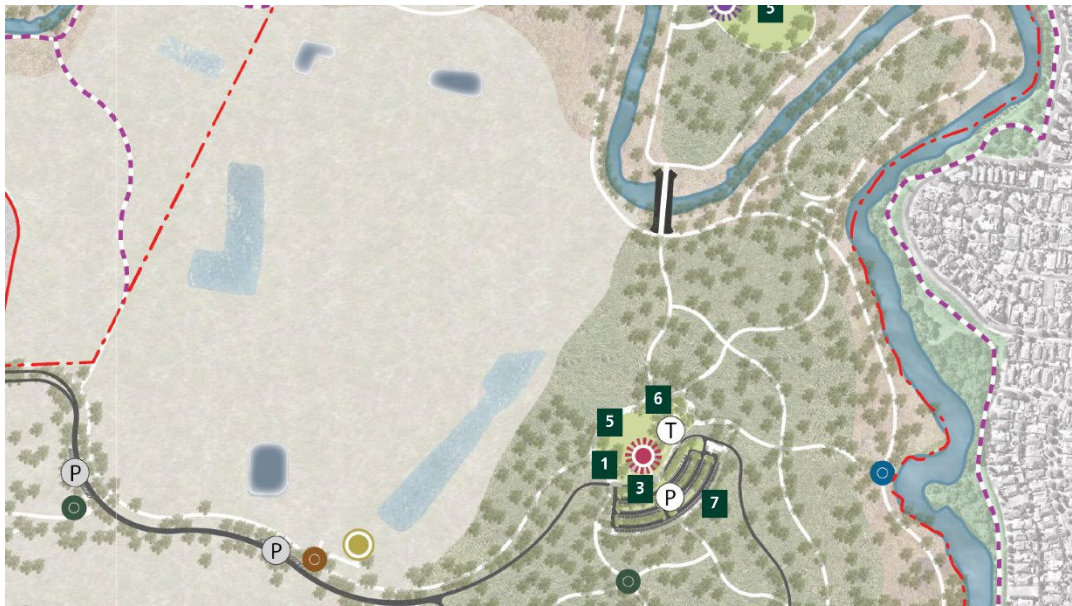


VNPA response to:
Draft Master Plan for Werribee Township Regional Park



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1. Executive summary

1.1. Who we are

The Victorian National Parks Association (VNPA) is one of Victoria's leading nature conservation organisations. It is an independent, non-profit, membership-based group, which for 70 years has existed to protect Victoria's unique natural environment and biodiversity through the establishment and effective management of national parks, conservation reserves and other measures.

The Grassy Plains Network represents land management professionals, academics, ecologists and community members concerned about the ongoing decline of grassy ecosystems across Melbourne and its surrounds. We advocate for improved grassland protection and management. We are part of the VNPA.

1.2. Key points

1.2.1. In general

- As far as a typical park masterplan goes, the draft Master Plan is generally well-considered.
- But this is not an ordinary park. As a consequence, the draft Master Plan is short on detail when it comes to governance, vegetation management and restoration. While it promises a good end product, it does not supply any of the necessary detail that would give us any confidence that the outcome will be achieved.
- There is a real danger that the conservation of anything beyond the legislatively mandated Melbourne Strategic Assessment Growling Grass Frog habitat will be put a far second to the visitor experience of woodland and river-based recreation.

1.2.2. Failure to address management a failure of fundamental vision

- At the heart of the inadequacy of this Master Plan is the fact that it avoids matters of management.
- Management is or should be part of the design master planning process. In the context of this park, it is a mistake to think it useful or appropriate to limit discussion of management to a management plan to be developed at a far later date.
- This is a conservation park being created from scratch. It is a Melbourne Strategic Assessment (MSA) Conservation Area for Growling Grass Frogs. Yet is also to be a highly visitor-focused regional-scale recreation space. The Park also contains areas of EPBC-listed Natural Temperate Grassland of the Victorian Volcanic Plain, as well as FFG listed grassland, woodland, and a riparian corridor with an extensive floodplain.
- Management is going to be fundamental to this large-scale conservation park's form, identity and its visitor experience. And that visitor experience is going to impact and inform the kinds of management actions that can occur.
- The visitor experience, and the park's management, are both fundamental and interdependent aspects of the park's character and purpose.

- The role and the means of management need to be embedded in this Master Plan. There needs to be a sense of the management reality and how that will interact with visitation.
- There is a amazing opportunity here to make a park of real value. We urge Parks Victoria to accept the challenges of this park rather than squander this opportunity.

1.2.3. Funding and tenure

- The Master Plan needs to very clearly address the overlapping, interrelated and conflicting requirements of the multiple aspects of the Park's character.
- The Master Plan needs to show the layers of governance that sit over the site. Who has charge of what? What areas have what KPIs? It is all well and good to say this area is going to be managed for conservation, but if there is no money and there are no KPIs associated with that then it is an empty promise and we know from experience that conservation values in that area will decline.
- Implementation of this regional park needs to include an adequate budget for managing native vegetation and revegetation into the foreseeable future.
- It is of great concern that at present there seems to be a reliance on Melbourne Strategic Assessment funding – yet this only covers measures for Growling Grass Frog.
- The majority of the grassland and Flood Plain Riparian Woodland corridor along Werribee River we understand is not covered by MSA funding.
- Given Parks Victoria's general lack of management of urban reserves in recent decades, this situation needs to be addressed.

1.2.4. Staging and priorities

- No staging plan is provided.
- No real sense of priorities is given. At the moment everything is a priority, which means nothing is.

1.2.5. Engagement and management together

- The master plan does not address how restoration and regeneration of the grassland is going to occur within the context of the high visitation rates associated with a popular regional park. Visitation will have significant impacts on grassland and other conservation assets.
- Management of the grassland (and all the conservation values) should be considered as part of the visitor experience, and vice versa. This is not a simple proposition, but it is essential if the biodiversity here is to prosper, not succumb to weed load and trampling.
- The general public are likely to wonder what the purpose of the large paddock is. Growling Grass Frogs are relatively easy to promote the understanding of. But a great deal of design and communication attention is needed to present narratives around the importance of grassland, and the less charismatic plants and animals for which it is home. While there are gestures in the master plan that allude to this, much more is required.

- The park design process needs to continue, with the aim of building a community dedicated to the protection of the conservation values of the park. We think this should be part of the master planning process. Budget should be set aside for ongoing engagement.

1.2.6. Survey, monitoring, adaptive management

- The park contains a whole spectrum of management needs, from highly weedy former agricultural land to good quality patches of Natural Temperate Grassland of the Victorian Volcanic Plain to insertions of new horticultural plantings and the creation of a woodland. The Western Grassland Reserve has shown us all how difficult it is to reverse decline in mixed-quality grassy systems at large scale. Here complex management is required, but with the additional complexity of having high visitation rates in the mix.
- It is difficult to comment on the spatial form of the master plan in detail because important background material, e.g. survey data, is not provided except in the most simplistic of forms.
- It appears that key environmental assessments still have not been undertaken. This is concerning and does not bode well for an ecologically driven outcome of the design process.
- What guarantees are in place that adaptive management will respond to changes in ecological integrity across the whole of the Regional Park?
- Monitoring should not default to simply the Melbourne Strategic Assessment Growling Grass Frog KPIs. This is unfortunately quite a likely scenario.
- The Werribee Woodlands section of the park needs to be put forward as of significant conservation value. No detail is given as to how we are going to enlarge that woodland from along the River.
- No detail is provided on the restoration processes being considered. For instance, the use of seed for the large-scale restoration that will be required to shift weedy former agricultural land.

1.2.7. Other matters

- Further detail would be useful around the extent of planting along pathways, signage and general interface with grasslands, which is currently somewhat vague.
- Entry points from Presidents Park appear to meet the Regional Park at the point where significant grassland exists. This may cause problems, in that people will wish to move directly into the park and not limit themselves to the shared path to be provided.
- Picnic areas are to have lawn. We would like to see further detail on how the spread of invasive lawn species will be constrained.
- Little attention seems to be paid to the significance of the confluences of the Werribee River with Davis Creek and the unnamed creekline to the south of the Regional Park.

- No mention is made of the controls that will be required on domestic animals, e.g. dogs. We suggest careful location of off-leash dog parks to minimise inevitable conflict with conservation assets.
- The parking and picnic area in the southwest corner: is that likely to impact grassland? The 'mapped' conservation values do not appear on the same map as these assets, making analysis of the master plan difficult.
- The Master Plan does not credit any of the consultants, only Aecom.