



IMAGINE
THE YARRA

DRAFT YARRA STRATEGIC PLAN

PUBLIC CONSULTATION

SUBMISSION COVER SHEET

Submission Number:	215053
Name (Individual/Organisation):	Town and Country Planning Association
Attachments:	Attachment 1 – Written submission



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28 March 2020

Engage Victoria

Via website

<https://engage.vic.gov.au/help-us-shape-final-10-yearstrategic-plan-yarra-river>

Re: *Draft Yarra Strategic Plan (March 2020).*

Please find on the following pages the submission of the Town and Country Planning Association Inc. to *Draft Yarra Strategic Plan (March 2020)*.

Yours sincerely



*Town and Country Planning Association
Incorporated*

**Submission to the
Draft Yarra Strategic Plan (March 2020)**

28 March 2020



About the TCPA

The Town and Country Planning Association (TCPA, at web address <https://tcpa.org.au>) advocates integrated planning of land use and transport for ecological sustainability and a healthy living environment. The TCPA is a registered non-profit public organisation, established in Victoria in 1914, and is independent of any party political organisation.

Overview:

The Draft Yarra Strategic Plan (YSP) is an impressive document. It sets out four objectives that are clear, well-articulated and balanced.

A healthy river and lands

Not surprisingly, the first relates to a healthy river and surrounding lands that are essential to improving water quality. Preserving the natural vegetation, billabongs and habitats is critical. The problems caused by rapid stormwater run-off in urban areas where hard surfaces cover much of the area will require increasing attention (as discussed later in this document).

A culturally diverse river corridor

The second objective is concerned with the heritage of the Yarra river, the Birrarung, and this is where the YSP sets a remarkable precedent: it recognises the role played by the traditional custodians of the lands surrounding the waterway over many thousands of years, and the significance of the river in their culture. It would be a mistake to think that the discovery of a quality water supply by early European settlers was simply a fortuitous historical accident. Continuing engagement of the Wurundjeri Woi wurrung people is a very positive direction.

Quality parklands for a growing population

The third objective recognises the great value of the river's parklands in supporting the wellbeing of a large population, through recreational and community activities. It is important that parklands along the river are accessible to all, and that pathways are interlinked with one another and with other parklands to provide a continuous network.

Protecting the natural beauty of the Yarra River corridor

The fourth objective is concerned with protecting and celebrating the natural beauty and landscapes along the river.

To these ends, the document presents a detailed land use framework for every reach of the river (upper rural / lower rural / suburban / inner city) from the Upper Yarra Reservoir to Westgate Bridge. It also includes photographs and maps that bring the waterway to life, and is written in a way that invites the readers' attention and ongoing interest.

The Yarra Strategic Plan should serve not just as an important reference, but as an inspiration to local governments, community groups, water authorities, planning agencies and others involved in its implementation, as well as to anyone interested in the planning, management and use of Melbourne's waterways and parklands.

Recommended improvements to the Draft Strategic Plan

Geographic extent of strategy, land use and transport within the valley

The TCPA proposes that the geographical scope of the Yarra Strategic Plan be expanded to include the tributary creeks and rivers that contribute to pollution of the Yarra.

The Strategic Plan needs to identify and then resolve potential conflicts between various recreational activities such as walking, cycling, sport, etc., and between human activities and wildlife and vegetation.



The nature and quality of the Main Yarra Trail changes with distance from central Melbourne, from a bicycle commuter highway to a recreational trail, the upper reaches of the trail being less suited to commuter use because of the hilly terrain and the use of gravel surfaces.

It is recommended that bicycle trails intended primarily for commuter use be separated from recreational trails that are shared with walkers.

Measuring achievement of strategy

The 10-year performance objectives are purely descriptive, with no numerical targets. Words such as “improving” are open to interpretation. Without using measurable attributes, such as the number of species, terms such as “greater biodiversity” are difficult if not impossible to substantiate.

Land Use Framework

The Land Use Framework covers many elements of the Draft YSP areas of interest. However, there are some significant gaps that need to be addressed before the strategic plan is finalised.

The Land Use Framework relies on the current state land use analysis undertaken for the *Yarra Strategic Plan Map Book 2018*¹. However, the TCPA has identified a number of inconsistencies between the Strategic Plan Map Book and the Draft YSP.

Most creeks are not labelled on the maps for each reach. Some are only considered in terms of the Draft YSP areas of interest (i.e. 500 metres and 1 km on either side of the Yarra River). However, several have attributes valued by the community in their own corridors which enhance links to and from the Yarra River.

“Catchment links” appear in some maps, but there is no discussion of the attributes of these links and the mapping is not consistently applied across all reaches. Indeed, there is no real discussion of these in terms of wider catchment opportunities/threats to or by the Yarra River strategy plan area.

It is recommended that the *Yarra Strategic Plan Map Book 2018* be reviewed and revised in light of the matters in this and following sections before the Yarra Strategic Plan is finalised.

Upper Rural Reach

Coranderrk Creek is an example where the Draft YSP only considers issues within the strategy plan area, but not in terms of its own corridor’s attributes that are enhanced by its links to the Yarra River.

Lower Rural Reach

Watsons Creek is shown as an area for protection and apparently part of the strategy plan area, with statements of significance and opportunities for its roles in the Draft YSP areas of interest. The TCPA acknowledges that Watsons Creek is significant in the Yarra River catchment. However, statements of significance and opportunities should be adopted for all tributaries:

- Brushy Creek confluence is recognised for its sites of particular ecological and cultural significance to the Wurundjeri Woi wurrung people within the strategy plan area. However, there is no mention of Brushy Creek corridor beyond the Draft YSP areas of interest.
- Steels Creek, Stringybark Creek and Watts River area mapped, but with no accompanying text or the significance of each as catchment links.

Suburban Reach

The main tributaries include Diamond Creek, Plenty River, Darebin Creek and Merri Creek, all of which have recreational trails connecting to the Yarra River. The tributaries provide vital biodiversity links into the catchment.

¹Melbourne Water, *Yarra Strategic Plan Map Book: Current state land use for the Yarra Strategic Plan* (September 2018). Accessed via <https://imagineyarrariver.com.au/document-library>



However, the Draft YSP needs to recognise other attractors along those tributaries which make their links to the Yarra River important.

- Mullum Mullum Creek is mapped, but there is no text or reference to it being a catchment link
- Other (5) “catchment links” are mapped, but not labelled on maps nor discussed in the text.

Existing projects, including the North East Link and Fitzsimons Lane projects, are mentioned and mapped. However, while the **Suburban Rail Loop** is mapped, there is no reference to it being a significant project.

Inner City Reach

Gardiners Creek Confluence: the statement of significance and opportunities again is an example of the approach that needs to be adopted for all tributaries of the Yarra River. However, there is no reference to Gardiners Creek being a “catchment link” despite its own catchment covering a significant area of the inner eastern metropolitan Melbourne.

The “former Williams Creek in central Melbourne” is given scant regard on the basis that “it is now the Elizabeth Street drain”. Nevertheless, the creek drainage line still exists, and it still re-emerges in Elizabeth Street from time to time after periods of heavy volumes of rain. The impacts of these flooding events affect the Draft YSP’s areas of interest. Lessons learned from these events need to be addressed in provisions of the Draft YSP.

The *Yarra Strategic Plan Map Book 2018* did not consider the reaches of the Yarra River downstream of the Charles Grimes Bridge. The land use framework for the area between the Charles Grimes Bridge and West Gate Bridge is given only the barest superficial analysis. This is a significant problem.

The Moonee Ponds Creek environs were not considered. Moonee Ponds Creek is mapped, but is incorrectly described as being “outside the study area”. In fact, the creek is the **boundary of the study area and the Port of Melbourne**. The TCPA considers that an assessment should be included of its significance and opportunities on its eastern side.

There appears to be no analysis of issues of significance to the Wurundjeri Woi wurrung. While the area has been significantly modified over the last 150 years, it would be surprising if there were no historical elements for the traditional owners that could and should be acknowledged.

Existing urban development and key transport projects in this reach need further assessment.

- Proposed Fishermans Bend tram routes are mapped, but their opportunities are not analysed
- Reinstatement of Webb Dock Rail Link, a Port of Melbourne project, and the Metro Tunnel 2 projects will both impact on the Westgate Park, but it is surprising that these are not analysed or mapped.
- Even though the West Gate Tunnel Project skims the outer edge of the Draft YSP areas of interest at the confluence of the Yarra and Maribyrnong rivers, the TCPA is surprised that there is no mention of the project.

Water resources:

There is need in the Draft YSP to give consideration of long term undesirable changes to natural waterways and aquifers. For example:

- How are the conditions of the natural waterways and aquifers in the wider Melbourne metropolitan area changing?
- With continuance of current use of these water bodies and with increasing urban growth, what are the expected trends in their quality and quantities of water?

We refer to contemporary hydrological maps of Melbourne's aquifers at:

http://www.water.vic.gov.au/_data/assets/pdf_file/0020/53462/Melbourne_Groundwater_Map_HighRes.pdf
(accessed in 2013)



<https://www.water.vic.gov.au/planning/long-term-assessments-and-strategies/sws/central> (current online publication)

With a trend towards restrictions on use of reticulated storage water for garden watering and washing of exterior surfaces, more households and businesses are installing artesian bores with pumps. Thus, there is the prospect of steady reduction in natural aquifers, due to human modifications to the natural hydrology, both from pumping out and from reduction in natural vertical replenishment by rainfall reaching the ground and soaking deep down.

This reduction in vertical replenishment is more likely in urban areas where a significant portion of the land surface is paved or roofed over, and the rainwater runoffs are channelled directly into horizontal storm water conduits emptying into metropolitan streams or artificial drains thence to the sea.

Ground paving poses significant problems in highly built-over areas as these surfaces prevent rainwater from penetrating to the roots of trees and shrubs, especially along paved streets. This hydrological deficit also increases the trend towards sub-soil shrinkage with subsequent damage to underground built structures such as building foundations and pipelines.

The other negative impact of rainwater runoff from “hard-surfaced” drainage (i.e. roofs, pavements and drains) rather than natural soils is the increased pick-up of contaminants, and the coinciding lack of natural biological conversion of such materials via soil biology, which discharge into the Yarra and its tributaries.

Thought should be given to small-scale infrastructure that allows rain water falling on roofs and pavements to drain via temporary holding pits and seepage drains into the subsoil to re-hydrate the soil strata and thus nourish plants.

Regulatory and/or financial offset incentives could be given to subdivision developers and public sector authorities (municipal councils, government departments and agencies) to install rainwater runoff collection drainage pipe networks which empty into earthen stream beds and local storage ponds.

These can be drawn upon via “third water” reticulation conduit networks to irrigate private gardens, parks and agricultural lands, with the expected large water flow surplus eventually draining into the Yarra River stream system. In this lexicon, “third water networks” (reticulation from lakes, streams and aquifers back to sites of human use other than as potable water) are distinguishable from “primary” water networks (i.e. potable water supplied from rainwater reservoirs), and “secondary” water (either storm water or sewerage networks).

The reticulation and storage pond at the “Waterways” residential estate near Braeside (south east metropolitan Melbourne) is a good example of capture and biological quality restoration of stormwater runoff.

Conclusion

The Draft YSP presents a land use framework for every reach of the river (upper rural / lower rural / suburban / inner city) from the Upper Yarra Reservoir to Westgate Bridge. The TCPA has identified that the Inner City Reach should be reviewed to give greater analysis of the areas of interest between the Charles Grimes and West Gate bridges. This work should be undertaken and circulated prior to any Panel Hearings.

With attention to the matters raised in this submission, the finalised Yarra Strategic Plan should serve not just as an important reference, but also as an inspiration to local governments, community groups, water authorities, planning agencies and others involved in its implementation, as well as to anyone interested in the future of Melbourne’s waterways and parklands.

The TCPA appreciates the opportunity to make this submission.



Panel and Directions Hearings

In raising these issues with the Draft YSP, the T CPA would seek to present its concerns to the panel proposed to be appointed by the Minister for Water. We would require no more than 15 minutes to make our presentation.

At this stage, the T CPA does not anticipate calling any expert witnesses and will be represented at the Panel Hearing and, if necessary, at the Directions Hearing by:

• [REDACTED]
[REDACTED]

I will provide further advice immediately should there be any change in our representation.

[REDACTED]