



IMAGINE
THE YARRA

DRAFT YARRA STRATEGIC PLAN

PUBLIC CONSULTATION

SUBMISSION COVER SHEET

Submission Number:	213388
Name (Individual/Organisation):	Individual
Attachments:	Attachment 1 – Written submission

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Submission on DRAFT YARRA STRATEGIC PLAN

To the Dept of Environment, Land, Water and Planning

Dear Sir/Madam

Thank you for the opportunity to make a submission on this important matter.

INTRODUCTION

I have a long and intimate association with the Yarra River [REDACTED] and have lived beside the river in North Warrandyte for 15 years before moving to my current address near Yarra Bend three months ago. My interest and work [REDACTED] comprised a comprehensive understanding of the issues affecting the river’s health, such as flows, water quality, bankside habitat, wildlife, and its important social values, such as its rich heritage, fascinating stories and importance to the wellbeing of Melbourne, not least being its main water source. The role including regularly patrolling the river in the Riverkeeper boat, giving tours to community and political leaders, delivering many talks and presentations, and publicly advocating for better care of this wonderful slice of nature. Ahead of the 2014 state election, [REDACTED] prompted the ALP’s commitment to a Yarra River Protection Act.

The foregoing demonstrates why I am very pleased that the draft Yarra Strategic Plan has been prepared and why I have some comments on it.

There are many facets to the Yarra, and its association with Melbourne, which concern me. But my overriding concern is how we can better care for the river in the face of Melbourne’s growth.

COMMENTS ON THE DRAFT YSP

There is much about the draft that I like. It covers most of the issues on my mind and incorporates an important linkage with the Traditional Owners, whose input has been sorely missing in most previous plans for the river. However, in order to be useful, my comments below focus on the draft’s shortcomings. They are presented under the question headings in your online questionnaire, not in order of importance.

Part 1: Working toward the Community Vision

1a. Do the four, 10-Year Performance Objectives adequately reflect the 50 Year Community Vision?

Somewhat

1b. Please outline your reasoning for this opinion (optional)

I acknowledge that the Performance Objectives are short-term, relative to the Vision, but they are meant to identify the necessary immediate actions that will move us towards the Vision. In this regard they fall short: they are too timid and have too narrow a focus.

OBJECTIVE 1 is about improving the river's natural environment. It correctly includes (a) increasing environmental flows, (b) strengthening habitat corridors, and (c) reducing litter impacting the river, which are all good. But there are three important gaps in the expression of the Objective.

Firstly, the overarching goal is stated variously as achieving "a healthy river" and "greater biodiversity", but makes no reference to the "quantity" of natural environment, be it the size of the river or the abundance of its wildlife. This is not a pedantic point. To aim for just a "healthy river" does not rule out it shrinking in size. To aim for "greater biodiversity" does not rule out shrinking the area of natural habitat. I would like the YSP to adopt the sentiments of *The Port Phillip and Western Port Regional Catchment Strategy* (RCS) where it talks about "the extent" and "quantity" of natural habitat.

Secondly, the Objective rightly seeks to reduce the volume of litter, but says nothing about the volumes of stormwater, pesticides, chemicals and wastewater entering the river. Instead it talks about increasing education, awareness, controls and management. That is good but not good enough. Consistency with the Visions demands that the YSP target within 10 years to reduce the quantities of such pollutants.

Thirdly, the Objective fails to mention that Melbourne's growing population has a major adverse impact on the river's natural environment. The document states up front that climate change and population growth, which are already impacting the river, are the two challenges that necessitate this strategic plan. But there is minimal analysis or discussion thereafter. Melbourne's population is projected to double in the next thirty years. In the 50-year timescale of the Vision, the population could be trebled. Such growth in human dwellings, urban infrastructure, water demand and pollution sources would place untold pressure on the Yarra's remaining natural features (more so than the changing climate). Yet this pressure is barely mentioned anywhere in the draft, apart from the increased demand for parklands. The consequential increases in stormwater, and compromises to landscapes get cursory one-line comments. There is no mention of the loss of natural habitat and the potential doubling or trebling of both water demand and sources of pollution. This is a serious omission in the document.

OBJECTIVE 3 is about improving river parklands and recreation. The link between parklands and human wellbeing is well articulated, and the aim to extend the parkland network is welcomed.

However, the push to increase physical access to the river by constructing more kayak/canoe facilities is problematic. They can detract from the natural beauty of the river, which is the main attraction for being on the water. This is a dilemma common to natural areas worldwide and warrants acknowledgement in the Plan and a tempering of recommendations to increase physical access.

A similar problem exists with the aim to have ongoing dredging of the river, which I presume is being advocated by the commercial boat operators in the Lower Yarra. The silts lying on the bed of the Lower Yarra are contaminated with heavy metals from bankside industries of the past. Dredging will mobilise those pollutants into the water column and adversely impact the river's fish and other fauna in this vital estuarine habitat.

This conflict between (a) increasing access to the river and (b) protecting the river's environment will become more acute with Melbourne's growing population. If, as

projected, the population doubles and then trebles in the next 50 years, the draft's recommendation to simply increase people's access to the river is a timid and inadequate response to the problem. I am not suggesting that the YSP should recommend solutions to population growth, but it must highlight that the well-being of the Yarra and its social values will inevitably suffer. The Vision of "a nurturing relationship between a river and community" will be unachievable.

OBJECTIVE 4 is about protecting the natural beauty of the river corridor from intrusive buildings and land uses. The importance of the scenic landscapes and the river's aesthetic values is appropriately highlighted, as is the need to protect them through better land-use planning controls. But the recommendations have two shortcomings.

Firstly, it is recommended that there be improved public access to viewing locations. This presents the same dilemma as increasing kayak/canoe access points mentioned above. The recommendation should be couched in terms that highlight this dilemma, and moderated accordingly.

Secondly, I agree with the need to strengthen the river's role as a vegetated corridor. But the recommended action to "monitor changes in land use" is incredibly weak. The action should be to ensure that future land use changes on both private and public land will protect and enhance the river's environment and natural beauty.

In this regard, the draft talks about a new land use framework, which will introduce, for example, needed permanent and mandatory controls on maximum building heights and minimum setbacks. But the fact sheet about this suggests a slow and tentative process for implementation. The Planning Scheme is one of the government's most powerful tools to protect/improve the river. It is a key mechanism for ensuring action, not just words. However, the steps forward are a bureaucratic obstacle course, whereby the "framework" will be drafted following a "panel review process" that will "outline directions" for future land use, and any actual policy changes remain subject to the Planning Minister's consideration. This gives little confidence that any effective new planning controls will materialise in the near term or ever.

2a. Are the actions identified to deliver the 10-Year Performance Objectives achievable, realistic and measurable?

All the actions are achievable, realistic and measurable. But as explained above, they are inadequate.

2b. Please outline your reasoning for this opinion (optional)

The most telling instances of inadequate actions are:

- Improving management of stormwater, chemical pollution and wastewater, but not targeting to reduce the quantities of these pollutants.
- Improving access for on-water activities and to viewing locations, but failing to temper such actions because of the potential consequential damage to the environment and views.
- Responding to population growth by extending the parkland network, but failing to discuss and highlight the dramatic impact that Melbourne's growing population will likely have on the river's water quality, water demand, natural habitat and landscape.

- Acknowledging the need for better land-use planning controls, but proposing a lengthy and fraught process for implementing them.

3a. Which specific actions do you think will be easiest or most challenging to deliver?

The actions associated with education, awareness raising and managerial processes will be relatively easy, whilst those with direct physical impact such as improving habitat corridors and extending the parkland network will be more challenging. But it is these on-ground actions that are essential. Without them, the river will gain no benefit.

4. What do you/ your organisation think is the greatest opportunity the Yarra Strategic Plan presents? Please rank the following statements in order of importance from 1 -4

Improving water quality of the Yarra River and protecting land, floodplains and billabongs

1-2

Acknowledging, protecting and commemorating the rich heritage of the Birrarung

4

Improving the river's parklands to support community wellbeing

3

Protecting the significance of the Yarra River's landscapes and views

1-2

5. Do you feel the draft Yarra Strategic Plan has put appropriate actions in place to ensure delivery on the aspirations of Traditional Owners?

This is an odd question to ask people who are not Traditional Owners. It is clear that they have been extensively consulted, and only they can give a valid answer to the question.

6a. Are there key priority areas of land you think should be added to the parkland network along the Yarra River?

Yes

6b. If you answered Yes, where are these key priority areas of land and why do you think they should be added?

The draft seeks to strengthen the river's role as a vegetated corridor and to improve public access to it. That's good. My vision is that, one day, the entire Yarra riverbank is a publicly accessible green space and an unbroken wildlife habitat. So, in order to stop the situation deteriorating further, I would first prioritise those sections of riverbank that are being threatened by more urban development: then start to return existing urban sites to publicly assessible green spaces beginning with low hanging fruit such as the Abbotsford Brewery bank.

Part 2: Land Use framework

7. The Land Use framework aims to put the Yarra River at the heart of future planning and development decisions. What is your / your organisation's view about the Land Use framework?

Repeating what was said above - The Planning Scheme is one of the government's most powerful tools to protect/improve the river. It is a key mechanism for ensuring action and not just words. However, the proposed steps forward (the Land Use Framework) are a bureaucratic obstacle course, whereby the "framework" will be drafted following a "panel review process" that will "outline directions" for future land use, and any actual policy changes remain subject to the Planning Minister's consideration. This gives little confidence that any effective new planning controls will materialise in the near term.

8a. Do you believe the Land Use directions will support the 50 Year Community Vision?

Yes

8b. Why do you think this?

Key elements of the Vision in this regard are "Our Yarra ... is an example of a nurturing relationship between a river and a community" and "is respected as a sacred natural living entity." In other words, the "unnatural" urban world does not impinge on the river.

The land use framework supports this Vision particularly in the following ways:

- introduction of permanent controls which prescribe mandatory maximum building heights and minimum setbacks;
- strengthen the vegetation buffer along the Yarra River, between public and private land;
- promote opportunities to extend and link parklands.

9a. Do you agree with the Land Use directions for the Yarra River?

Yes

10a. Do you believe that the 13 significant places identified for the river corridor reflect the most regionally significant locations?

I cannot find the list of "13 significant places".

13. Finally, what are your overarching thoughts and feelings about the Yarra Strategic Plan?

As stated in the beginning, I am very pleased that the draft Yarra Strategic Plan has been prepared and there is much about the draft that I like. It covers most of the issues on my mind. My main concern, however, is its silence on how Melbourne's projected growth will put the Yarra under even more pressure than it faces today, and (in my opinion) puts the 50-year Vision out of reach.

Submission author [REDACTED]