

Our Yarra: Healthy, Protected and Loved

7 July 2019

Submission by the Yarra Riverkeeper Association:

Draft City River Strategy: Future Aspirations for Melbourne's Inner City River (April 2009) – City of Melbourne

Introduction

The Yarra Riverkeeper welcomes the City River Strategy (CRS) from the City of Melbourne, and compliments the authors and the council on their thoughtful consideration of our river. The increasing focus on the Birrarung (we will follow the custom of the report and use the traditional name of the river) is appropriate and reflects a number of other work and strategies that is on-going, including the Yarra Strategic Plan. It is entirely appropriate that Melbourne as a river city, turns the focus of its attention to the Birrarung, and develops a detailed strategy that will introduce Traditional Owner values and story-telling into the management of the river. We believe that the centre of any river policy needs to be that the river be treated as 'one living and integrated natural entity' (words from the Yarra River Protection (Willip-gin Birrarung murron) Act) and that ecology, the 'naturalness', needs to be front and centre. The strategy successfully recognizes the importance of the Yarra Strategic Plan and the value of the 50year Community Vision. 'What is good for the Yarra is good for all.' (from the 'Whole River 50 Year Vision'). We are concerned that there is a lack of reference to the tools in the Planning Scheme and regulatory tools and the need to abide by, enforce and amend Planning Scheme rules. A key opportunity to be considered in the final draft is the expansion of the Declared Yarra River Lands and Greater Yarra Urban Parklands below Princes Bridge. In particular the need to draw a line in the concrete on overshadowing, not only of the South Bank from the north but of the Northbank. A detailed assessment of the overshadowing of both banks and the river needs to be commissioned, and the opportunities for open space development and connection of the remaining sunlit spots on the Northbank. Sunlight is the key to the development of the Northbank. The successful South Bank is connected by pedestrian routes up and down the river but the key attractant for city dwellers is sunlight. The importance of sunlight (and the generation of Vitamin D) has not been considered in this draft and needs to be considered in the final report. Connectedness is a critical feature of a river corridor. This is considered within the area of the report but that area is only a small part of the river corridor, and the boundaries of the report are not recognized by water and wildlife. One example is that environmental flows impact on water levels and the shape of the salt water wedge in the estuary. The final report needs to consider this reach in the context of the whole river. The report also lacks a context of how the council intends to roll out a river strategy both up and down the river. Yet the report presents a range of opportunities and possibilities that can be consolidated in the final draft.





Above: An innovative and fun solution that deals with the endemic shadow and cold of the Northbank of the Birrarung, although a solution on a limited scale.. The challenge of activating the Northbank has been made more complex by the failure of the Planning Scheme to effectively protect both banks of the Birrarung. Development on the banks should be pushed back and developments further away from the river been limited in height to ensure no overshadowing. Remaining areas of sunlight on the Northbank should be nurtured and protected, and the sort of innovative thinking represented by these igloos used to activate the Northbank

Below: The relatively recent development built right on the river bank and setting the Northbank in permanent shade. This is what lies directly behind the plastic igloos. Overshadowing the Northbank inflicts an economic cost on the community, and on a future more sympathetic development of the river. Building on the edge of the river itself also then demands heavy engineering solutions, which creates hard impermeable edges to the Birrarung.



Who are we?

Formed in 2004, the Yarra Riverkeeper Association speaks for the Yarra (Birrarung), Melbourne's own beautiful, resilient, iconic river. It is one of the key stewards of the river and recognizes the importance of 'caring for country' values in river management. The Association is the credible and authoritative voice for the River. It is an independent community of citizen-advocates that works solely in the interest of the river. The spokesperson of the Association is the Yarra Riverkeeper. The Yarra Riverkeeper monitors the river in the Association's boat and on foot, by bike and by canoe. That enables the Association to build a detailed understanding of the complex connections and interactions of the ecology of river and its role in the City of Melbourne and in the Yarra Valley. This understanding is shared with the community through the Association's educational programs, website, and social media. The Yarra Riverkeeper Association was also effective in asking for better legislative protection for the river, which resulted in the Yarra River Protection (Willip-gin Birrarung murron) Act and the changes in planning controls along the Yarra River. Community groups look to the association and the Yarra Riverkeeper as representing whole-of-river views. The Yarra Riverkeeper participates in a number of agency and government committees and is a member of the Birrarung Council, created under the Yarra River Protection (Willip-gin Birrarung murron) Act (YRP(WGBM)).



A pair of chestnut teal seen on the inner city reach of the Yarra on Saturday 6 July 2019. The birds, while not common on the Yarra, are not uncommon. This handsome dabbling duck forms pairs that remain together outside the breeding season. The Yarra Riverkeeper speaks for the community views of the Yarra, and for the wildlife that bring life and movement to natural places.

Format of submission

We will begin with some general comments about the direction of the document and its language then we will mirror the report structure with a short introduction for each section followed by a response to the strategic directions, as required, in table form We will then follow the contents of the strategy in the order, including responses to chapters and sections where appropriate, and then respond in a table to the strategic directions.

Key challenges

Introduction

The Strategy

Strategic Directions Why this Strategy is needed **Ecology: Habitat and Water** What we want to achieve Background Approach Kev challenges Strategic Directions Strategic context Study area and conditions today **Place: Activity and Character** The Vision Background Key priorities Key challenges Strategic Directions Strategic Directions Background **Movement: Journey and Connection** Changing role of the Yarra River Background Governance arrangement Key challenges **Strategic Directions** International context **Culture: Heritage and Narrative Strategic Directions in summary** Background Next steps

'Introduction'

A key concern of the Association is that the value of the Yarra, in particular the ecological and open space of the Yarra is under acknowledged. For example, the following sentence appears in the introduction 'The Birrarung corridor has strong cultural, economic and social significance to Melbourne.' This is representative of a view, written into the language of the report, that places the river at the service of other ends rather than it being an end in itself, albeit perhaps one of several important ends. For the Traditional Owners the river is not a means to an end, and while 'caring for country' delivers benefits for people, it most importantly delivers benefits for all, for the environment as a whole, of which people are the entities that have the ability to selfconsciously care for the environment and articulate the needs for that caring. If we are to be sincere in our acknowledgement of the long history of indigenous Australians careful stewardship of the landscape then we must review the language we use and therefore the ideas that underpin that language.

The introduction states here: 'The information introduced here will be the basis for ongoing research, discussion and engagement to identify further issues and opportunities as this project evolves.' We flag the issue that there have been many river strategies before that have been inconsistently followed through. A clear long-term implementation plan is needed alongside the strategy, with a time horizon of 50 years to match that of the Yarra Strategic Plan.

Strategy

'Why this strategy is needed' (p7)

We would like to see a clear statement of the need to rehabilitate and improve the natural spaces along the river corridor in the city of Melbourne, not only for the benefit to the growing population but as a commitment to restoring the damage to the ecology of the river and its effectiveness as migratory corridor for plants, insects and other wildlife. There needs to be a statement that a river strategy demands reconciliation with the past, present and future of traditional owners, and reconciliation with traditional landowners requires reconciliation with land. Reference needs to be made to 'caring for country' albeit in a much-changed setting to what that concept came about in. The challenge of a river strategy is how does it 'care for country' in a city of almost 1 million, and one that is growing - rapidly. We need a policy explicitly directed new residents, corporations, and business owners to explain the significance of the river to Melbourne as 'one living and integrated natural entity'. There needs to be a clear recognition of the 'obligation to keep the Birrarung alive and healthy – for all generations to come' (statement in the preamble to the YRP(WGBM) from the Wurundjeri). This is an obligation of the traditional owners and we need to share in that obligation as we reconcile with people and land.

What we want to achieve (p.7)

This section states that this strategy is an advocacy tool and as such the CRS needs to be aspirational and long-term with a vision of where the river will be in 50 years — and in one hundred years. We do not consider that water quality can be excluded for any plan on any reach of the river, since it has:

- o a significant impact on the river,
- Council's own stormwater systems impact on water quality, including through polluting litter, and a significant element is the large areas of hard surfacing in the city.

Approach

The approach needs to begin with an acknowledgement of what is there in terms of natural ecology. At the base is the environment and everything follows from that. The first theme needs to be 'Ecology: Habitat and water' and the rest should follow. The approach needs to be informed by an understanding of how natural systems have adapted to the presence of people, and how the built environment has impacted on natural systems.

Ecology and environment need to underpin the sense of place. We are dependent on the environment for all other values. Buildings and the built environment rise and fall but the environment remains.

There does need to be a clear statement of the geographical remit of the report. What are the boundaries. A clear map needs to be offered of what it is that the CRS refers to.

Strategic Context (p. 9)

The recognition of the forthcoming Yarra Strategic Plan is an essential inclusion in any strategy for the river. The Association appreciates its inclusion along with the 50-year community vision that underpins the strategic plan. The CRS also needs to consider how to drive and aspirational outcome for the Yarra Strategic Plan as the Melbourne City Council is one the endorsing entities for the plan. Further the CRS needs to include recognition of the need to expand the declaration of Yarra River Lands and the Greater Yarra Urban Parklands (GYRUP), and how the CRS can extend and consolidate the concept of the GYUP. A map of the declared lands would be useful in the context of this section. There should also be a section on how the CRS is to fit with the Wurundjeri-Woiwurrung Tribal Land Council's water policy.

The strategic context needs to also acknowledge is that the inner city reach is on the receiving end of actions taken upstream. One example is of environmental flows. The city needs to advocate for flows to ensure that there is adequate water in the reach. There also needs to be consideration of water quality and stormwater both of which significantly impact on this reach. The CRS needs to advocate for improvement in water quality, including through the Yarra Strategic Plan

Study Area and Conditions Today (p. 10)

We note that most of the photos shown of 'unsuccessful' river bank areas are on the Northbank and suffering from endemic shadowing.

The vision (p. 12)

We are pleased to see the CRS include aspects of the 50 year community vision. We are cautious of over-emphasizing 'celebrating' Aboriginal culture. Such celebrations need to be tied to concrete actions that are directed to stewardship. One such action might be in using the Narrap team as a key contractor in the inner city reach. 'Embedding' Aboriginal culture may be a better term, and it needs to be noted that it is a 'living culture'. Culture needs to be about reconciliation as well, reconciliation with land and people and we cannot reconcile unless there is understanding and celebration of both sides of the cultural coin. We support the inclusion of the maritime heritage of the river.

The vision states 'The Birrarung is critical to Melbourne's identity, appeal to tourists and liveability' without mentioning the ecology. It is also critical to living systems both in Melbourne and all along its course. It is a challenge to the CRS to adequately include an ecological viewpoint of the river as single and integrated living entity and not slip back in the now more dated language of the river being an economic asset, and to see it solely from a human-centric viewpoint. Not what can the Birrarung do for the city but that what is good for the Birrarung is good for the city.

The river needs not only to be greener but cleaner. The issue of litter is under-addressed in the draft. The city is both a receiver of litter coming from upstream and a major contributor of litter itself.



Selection of photos of litter in the city from a walk down Little Lonsdale Street and adjacent lanes on 22 June 2019. This litter will be washed into stormwater and into the river. The three lower photos are of waste from building sites. Are there opportunities for better regulations and better enforcement through the planning scheme.

There is a lack of inclusion of community in the draft. Such community initiatives as the Yarra Pools have not been included and should be considered for the final report. The Yarra has a proud recreational history pre and post contact, including swimming races and events such as Henley on Yarra which would see as many as 60,000 people attend. and this needs to be covered in the vision.

The Themes are well-chosen though we challenge the inclusion of the need to prioritize the Northbank, unless there is consideration of the issue of overshadowing.

International

Thank you for the survey. We would also include the San Antonio Riverwalk, which is an example of river restoration where the economic benefits have far exceeded the economic benefits have far exceeded the costs, and the ecological component has been carefully considered. <u>https://www.thesanantonioriverwalk.com</u>. Another interesting

international example is the way that creeks in Salt Lake City are allowed to flow through arcades and shopping centres providing connectivity into the catchment through the built environment.





The incorporation of streams into the built fabric of Salt Lake City. These waterways appear and then disappear into a culvert only to reappear again.

Strategic Directions **Priority areas**

CULTURE: HERITAGE AND NARRATIVE

In the Key Challenges (p. 27) it is noted that the Aboriginal cultural layer is underrepresented and we support this statement but we would not wish see this as an excuse to undervalue the historical heritage of the city's built form. Both activities need to be undertaken. Further we believe the strategy needs to note that the great parks and gardens along the Yarra are a physical expression of the European cultural heritage the challenge is not to devalue this heritage but to combine it through reconciliation into something new, and something that is new and resilient to climate change. An example outside of the strict are would be to replace parts of the grassed areas above Princes Bridge with native grasses.

Strategic Direction	Response
COLLABORATIVE Establish a protocol for on-going collaboration with Traditional Owner groups to help tell the story of the Aboriginal connection to the Birrarung.	Supportive. Though this needs to be rephrased to make it clear that it is more than story telling.
C1A: Collaborative. Establish a protocol for on-going collaboration with the Traditional Owner groups to establish an Aboriginal cultural narrative of the Birrarung.	Supportive. This response needs to go further of this - the connection and collaboration should extend beyond telling the story into engagement about the river, its care and health, as per the YRP(WGBM). There needs to be an effort to bring the return of cultural significant species, including ravens (Waa is the keeper of waterways) in visible and recognizable populations. This strategic direction should be about embedding Traditional Owner 'caring for country' in the river management.
C1B: Collaborative. Commission further research of historical data with a focus on the botanical aspects of indigenous vegetation.	Supportive. Particularly if this research is shared widely, of if the research is undertaken with partners (such as the Royal Botanic Gardens). This knowledge then needs to applied in terms of planting on the river. There needs to be an active element to knowledge-gathering. It needs to be gathering with intent.

VISIBLE Increase the public visibility of Aboriginal intangible heritage and the history of the Birrarung through interpretation and information.	This needs to be more than visibility it needs to be about a 'living culture', those values and how the City of Melbourne is embedding that in their approach to the river strategy. There needs to be clear articulation about how this strategy fits with the Wurundjeri Water Policy document.
C2A: Visible. Increase the public visibility of the Aboriginal history of the Birrarung through information and interpretation.	Supportive. The responsibility on the community to 'care for country' needs to be part of this.
C2B: Visible. Recognise the historical and Aboriginal cultural importance of the Yarro Yarro Falls.	Supportive. Even a public conversation about this is useful for understanding of the ecology of pre-contact Victoria and having a conversation about the impact of people on landscapes and the challenge of rehabilitation/restoration.

MARITIME Recognize the historical and contemporary importance of the maritime uses of the Birrarung.	Supportive. This could also recognize the value and importance of rivers to humanity.
C3A: Maritime . Recognise the historical and contemporary importance of the maritime history of the Birrarung.	Supportive. Maritime history is an opportunity to understand the settler society and how people came to arrive. There is an opportunity to develop the maritime history, including recognition of the fish market, into a compelling tourist tale, as other cities have done. We need to acknowledge all of the social histories and contemporary importance of the Yarra. beyond 'maritime'. It is important to include the rich recreational/social history - Yarra as a place for people to swim/bathe, to gather for public events (aquatic spectacle, Henley on the Yarra), and the continuity with current day activities such as rowing, as well as the introduction of new 'traditions' such as dragon boating. Suggest that the area between Queensbridge and Spencer St Bridge offers many opportunities for a continuing and incomplete narrative: from the significance of the Falls, to the Turning Basin and the relationship with the Customs House and the Port Authority Building. The Yarra Pool at Enterprize Park would develop as a 21st C response of repair, restoration and connection. This would enable the story of Melbourne's founding and subsequent development to be told as a continuous narrative with many chapters. Suggested action here would be to heal the division between the River and the City.

ECOLOGY: HABITAT AND WATER

Strategic Direction	Response
RIPARIAN GREENING Re-introduce a riparian zone to improve water habitat, biodiversity and create a healthy river ecosystem.	Very supportive. The imagery of wetlands on the bank reconnected to the river are powerful.
E1A: Riparian Greening. Introduce riparian vegetation to shallow sections of the river.	Very supportive. This also needs to include of habitat and the overall connectedness of habitat along the river. The reed beds function as natural litter traps.
E1B: Riparian Greening. Create floating habitat in the urbanised river sections.	Supportive. A very exciting idea. These could also take up nutrients. Note the recent proposal in the Melbourne Design competition to use mushroom 'waste' to create the islands of habitat. Enterprize Park projects should 'give back' to the natural ecosystem. Note: this is imbedded in the Yarra Pools ethos, research and goals.
ECOLOGICALLY CONNECTED Optimize the urban vegetation along the river banks prioritizing an Indigenous palette to improve local biodiversity and ecological networks.	Very supportive. This needs to be considered in terms of roosting and nesting sites, as well as appropriate structural layers from leaf litter to canopy.
E2A: Ecologically Connected. Prioritise a diverse landscape palette with a native focus on the river banks.	Very supportive.
E2B: Ecologically Connected. Encourage a wildlife corridor along the river that connects city users with nature.	Very supportive. Alongside encouraging species return, encourage learning about species so people embrace it all the nature - the insects, snakes etc - that may return with will rehabilitation efforts. This needs to use the thinking, from rewilding/stewardship of cores and corridors, with the cores being larger areas such as the RBG and Westgate Park that are connected by healthy corridors. (Please see

E2C: Ecologically Connected. Create	forthcoming report from the Yarra Riverkeeper. It is worth also including any aspirational ideas like reconnecting the RBGV site with the river i.e. closing/changing Alexandra Ave? Very supportive. Salt marsh is an important
saltmarsh habitat conditions to attract a selection of wetland birds	vegetational type that is on decline. The value of
RESILIENT Address flood risk and improve water quality	This also needs to address litter issues.
E3A: Resilient. Investigate the reinstatement of the Falls to provide fresh water closer to the central city.	Supportive but concerned that the cost will out way any benefits. Also note that ecosystems have adapted to the extension of the saltwater wedge and reinstating the Falls would destroy the new balance that has been achieved. A public conversation around this idea will be illuminating for city residents/visitors, even if it doesn't eventuate. It creates space for a reckoning with the past and the impact of humans on landscapes
E3B: Resilient Explore potential water retention measures in public spaces on the river edge.	Supportive but would like a bit more attention given to addressing storm water issues
E3C: Resilient Include water sensitive urban design (WSUD) and other initiatives in the river precinct to improve water quality.	Supportive. Also work to improve this beyond the city river precinct.

PLACE: ACTIVITY AND CHARACTER

Strategic Direction	Response
INVITING Prioritise Northbank renewal to create an inviting destination immediate to the City.to	The Northbank can only be renewed if there is not only consideration of connectivity from the city to the river precinct and along the river bank but also the issue of overshadowing.
P1A: Inviting. Create an attractive backdrop to the Central City through major upgrade works to Northbank.	Supportive. particularly improving connectivity with the city - may call for bold thinking about roads and traffic in this precinct. Acknowledge the proposal by Yarra Pools - research and investigation done by this group, which includes and addresses all other strategic directions in this strategy and has significant community support – at least acknowledge it as an option. Any project on the Northbank must give back to the river and to the city — and be bold given the unsuccessful attempts to reinvigorate this part of the river. A good community focused space rather than more eating/drinking venues would be welcome.

P1B: Inviting. Activate deserted zones through a program of events and activities.	Supportive, with concerns. The riverfront and particularly areas sheltered by viaducts around Enterprize Park provide shelter for a number of people experiencing homelessness. We have concerns about the balance between activation and shelter and would like to see this respectfully and inclusively handled by Council. Re programming of events: as long as there is a solid, long term plan and budget to
	achieve this and that the events and activities are of high quality, inclusive, and appropriate for the river edge, and in line with other key strategic directions of this document, e.g. ecology and resilience. Again, something like Yarra Pools seems like an obvious avenue for achieving 'activation' without the need for a rolling calendar of programmed events.
MULTI-FUNCTIONAL Celebrate character areas and encourage new economies: a range of civic, educational, cultural, hospitality and water dependent use.	Supportive.
P2A: Multi-functional . Encourage a range of civic, educational, cultural, hospitality and water dependant use.	Supportive, with the caveat that there are limits to multi-functionality and these need limits need to be considered. Children's water and nature play area sounds wonderful. We support the notion that there is room for economic activity beyond eating and drinking (and non-economic activity e.g. fishing, kayaking, birdwatching, dangling your feet in the water?)

P2B: Multi-functional Build on diverse character districts to create a series of unique experiences.	Supportive, this describes what's already there and the proposed 'new' precinct personalities sound good
PUBLIC Sustain the civic focus of the river by encouraging activation that offers broader inclusion and supports a public waterfront.	Supportive.
P3A: Public. Ensure unrestricted public waterfront access.	Supportive. The Association also supports the buying back of any private land when/if it becomes available. And reduction of infrastructure and buildings the overshadow the river. Consideration should be given to raising bridge where they meet the Northbank, where possible, to give unrestricted pedestrian access along the river. We note that the walk bridge across the river at Spencer Street Bridge has now been closed for many months, which sends the wrong message to citizens and tourists alike.
P3B: Public Encourage waterfront buildings to address the water.	Supportive. The Association in particular agrees with this sentence particularly "Future waterfront developments should be required to feature active frontages that welcome the public and embrace the waterfront. All landscapes in waterfront developments should also be publicly accessible" The Planning Scheme should be listed as a tool to create setbacks and height limits to protect the corridor, and to prevent overshadowing. No further overshadowing of the river should be permitted.
P3C: Public Promote activities that support a public waterfront.	Supportive. We note that the second paragraph on page 52 is a misunderstanding of the role of the Birrarung Council. The council is note there

	to strike a 'balance between business development and environmental concerns'. The function of the council as defined in the legislation is firstly centred on the Yarra Strategic Plan and secondly to 'advocate for the protection and preservation of the Yarra River. Please see clause 48 of the YRP(WGBM).
LEGIBLE Rationalize clutter and on-water infrastructure to ensure unobstructed vistas and views.	Supportive. Many store holders and the like use odd places for storage of chairs and beer barrels and the like. We are supportive of Pony Fish Island but note that parts of the Island are unsightly due to items being stored in public view.
P4A: Legible Rationalise clutter to ensure unobstructed appreciation to identified views and landmarks.	The increased use of the Yarra and its banks for recreational activity makes this a welcome approach. However, given the complex governance to the river and the banks, as noted in this strategy, such regulations/requirements (and who is responsible) would need to be clearly communicated to all riverside tenants/operators
P4B: Legible Develop a technical guide for waterfront treatments to establish a consistent palette.	Supportive. In terms of colour palette, we oppose the use of European shrubs and trees due to the jarring nature of the clash in tones.
P4C: Legible Provide additional bridges only where cross river connectivity is critical.	The Association in general opposes further expansion of bridges in principle. Individual projects would need to be considered would need to be considered on a case-by-case basis, based on firm and consistent principles. Careful consideration of viewsheds , and additional overshadowing, would be critical.

MOVEMENT: JOURNEY AND CONNECTION

Strategic Direction	Response
Slow M1A: Reduce modal conflicts through development of a safe, alternative Northbank bicycle route. M1B: Continue delivery of the alternative Southbank bicycle route.	Supportive. Cycling along the river front is an important way of connecting people with the Yarra, but the concerns of conflict between transit modes is valid and the alternative bike routes make sense. Agree the south end of the CBD is lacking a safe east/west bike route, and the Flinders St proposal addresses this.
INTEGRATED Transform the condition of key 'barriers' to address the gaps to the north-west and integrate access with the City.	Supportive
M2A: Integrated Better integrate pathways along and leading to the waterfront by creating direct crossing arrangements and amenity improvements.	Agree with and support improving pedestrian connectivity and the improvements to pedestrian amenity. The area highlighted around Williams and Queen is so problematic and unwelcoming. The proposed major transformations are ambitious but a step in the right direction.
ACCESSIBLE Raise the quality and universal accessibility of riverfront pathways.	Supportive. As long as it does not compromise habitat quality.
M3A: Accessible Deliver universal accessibility at key waterfront access points M3B: Develop a wayfinding and signage strategy to ensure easy waterfront navigation. M3C: Ensure pathway widths, physical conditioning and maintenance safely caters for everyone.	Supportive of ensuring the river is accessible for everyone, and encourage the considered, respectful, integrated design responses for accessible infrastructure like lifts and ramps. And likewise with riverside wayfinding - given the encouragement of activities like non-motorised boating (M4A), consider on-water wayfinding strategies, too.

DIVERSE WATER ACTIVITY Encourage more water related activity and greater diversity of vessels, particularly more non-motorized crafts.	Supportive. There needs to be more publicly accessible launching sites at a variety of spots along the inner city reach with access for a vehicle to pick up or drop off. Most of the commercial use only landings are both underutilized and deprivation of a public right of access. Appropriate fishing should also be encouraged.
M4A: Seek diversification of vessels, operators and encourage more non- motorised water transport use.	Supportive. We note the growth of dragonboats and outriggers in Victoria Harbour and would like to see their presence further up river. While supporting of the long tradition of rowing on the river, we note that the effectively exclusive rights of the rowing clubs above Princes Bridge needs to be broken down and the clubs encouraged to welcome a greater diversity. We note this requirement should be built into the next contract term. In the next contract term, any commercial use should have a component of the revenue returned to the river.
M4B: Consolidate central city berths and reduce exclusive berths in the longer term	Supportive. There needs to be an encouragement of a greater diversity of operators such as Kayak Melbourne and Kayak Melbourne, and the gondola of Venice on the Yarra.



An example of an alternative water craft.



Enjoying the sunlight on the Southbank of the inner city reach of the Yarra. Exposure of the bare head to sunlight is essential to generate Vitamin D. This healthy dose of sunlight is not available now on the river and on the north bank, due to overshadowing, from the Docklands upstream through the inner city reach. It is a problem that is rapidly worsening due to construction at Docklands.



Overshadowing of the Southbank by the Rialto. Note the difficulty of adequately photograph due to the high contrast.