

# Andrew Kelly

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## Submission to the Draft Yarra Strategic Plan

by Andrew Kelly

*This a personal submission but is informed by my professional experience of being the Yarra Riverkeeper since November 2014. I have been privileged to be the Yarra Riverkeeper and I have learnt much in the past six years about the river, and that has also brought an awareness that there is so much more to learn. The river is dynamic and living and constantly changing. I want, and the association desires, the best outcome from the Yarra Strategic Plan (YSP) for the river. I have chosen in this submission to take a page by page approach so that the submission delivers most value in the redrafting of the YSP. My submission is complementary to the joint submission of the Yarra Riverkeeper Association/Environmental Justice Australia.*

### Overview

I am in support of the many good aspirations of the draft YSP and acknowledge the good intentions of of the Yarra Collaboration Committee and the Lead Agency, Melbourne Water.

A key consideration that I have asked myself is will the YSP ‘Wilip-gin Birrarung murrn’ (Keep the Birrarung alive), as specified in the title of the Yarra/Birrarung Act, over the 50 year life of the act, in the face of the pressures of urbanization, steep population growth in the catchment and climate change.

Many of my concerns about the YSP are about the implementation of the aspirations and how that will be executed over the 50 years of the plan.

The plan is quite difficult to follow in its structure and needs to reflect the act more. There needs to be greater clarity about what is the purpose of Part 1 and how it is connects to Part 2. The Healthy Waterways Strategy is complementary to the YSP. That relationship needs to be further articulated in the YSP. The HWS sets waterway targets. The YSP goes into one catchment in more depth, extends beyond the immediate waterway boundary. The YSP is an opportunity to express HWS in land use framework, in planning schemes, and to extend coverage to private land. The YSP also must reference the Yarra River Action Plan and look at opportunities within that plan such as the Gifted Assets Policy and the Green Infrastructure Taskforce.

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## Governance

I have four concerns

- a) The draft YSP was prepared by the Yarra Collaborative Committee (YCC) and not by the Lead Agency as required under the Yarra River Protection (Willip-gin Birrarung murrong) Act (Yarra/Birrarung Act). This is inappropriate in governance terms as the members of the YCC are responsible the implementation of actions under the act. The committee has disempowered the Lead Agency from producing a transformational plan which they can then publicly endorse elements of the plan - or not. The 'showcasing' of business-as-usual is a symptom of the Lead Agency not drawing up the plan. The plan should have been drafted and then put out for endorsement. By requiring endorsement of the plan before its release the quality of the plan has been compromised.
- b) A committee, particularly a large committee with a diversity of interests, is a poor structure for developing a plan.
- c) The YCC has not fulfilled the requirements under the act to include the community in the draft Rather the consultations by the YCC has happened behind closed doors. The endorsement demand has been a barrier to public and community forums. The act is clear that the draft YSP:

through an open and collaborative process involving responsible public entities, local community reference forums and the Council; and

(b) in accordance with any guidelines under section 22; and

(c) having regard to the Yarra protection principles; and

(d) in accordance with best practice regarding public participation, by seeking to collaborate with the community and ensure that community concerns and aspirations are understood and considered;

The community have largely been left out of the formulation of the draft plan.

- d) The plan needs to demonstrate in concrete terms how modern governance will deliver better outcomes for the river. For collaboration to be effective it needs senior roles from all sectors to be involved. The successful Derwent River Authority was made up of CEOs from councils and business, and departmental secretary. The YSP needs to reference best practice in modern governance. Collaboration should include collaboration with community, as required under the

## Climate Change

As a 10-year plan with a 50-year horizon the plan does not address climate change sufficiently within the plan. Likely scenarios need to be considered and the need for a continuous vegetated corridor along the Yarra is also prime habitat needs to be considered. The need for protected areas protected from significant human access, or biodiversity sinks, needs to be consider as

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part of the response to climate change. The Yarra/Birrarung Act states under its General Principles: 'Decision-makers should take into account the best practicably available information about the potential impacts of climate change so as to avoid, so far as possible, serious or irreversible damage resulting from climate change.' The YSP also needs to consider scenarios of the impact of climate change (and urbanization) on the river.

## *Net gain*

The YSP is the advocate for the net gain for the environment principle contained in the act, yet it is hardly mentioned. This is a key part of the act and therefore should be a key part of the YSP. Similarly, the opportunity created by the act's reference to the Greater Yarra Urban Parklands has not been taken up.

## *Funding*

The government needs to be prepared to commit significant funding to ensure the plan is implemented and YSP can reverse the decline in river health.

## *Decision-making framework*

The absence makes of the decision-making framework makes it difficult to assess how the YSP will work.

## *Baselines and targets*

The inclusion of baselines from such documents as the State of Yarra report is critical to creating an effective plan, as are targets.

Page	Item	Comment
cover		Rename subtitle of plan to A 10-year draft plan for the Yarra River corridor, establish a foundation for the 50 Year Community Vision

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4	Executive Summary 'As a 10-year strategy, the Yarra Strategic Plan sets the foundation to achieve the Yarra River 50 Year Community Vision and deliver the Wurundjeri ... <i>Ancient Spirit and Lore of the River</i>	Agree noting the unavailability of the <i>Ancient Spirit and Lore of the River</i> online.
4	The Yarra Strategic Plan has been prepared by the Yarra Collaboration Committee ...	This is a conflict of interest for the body preparing the plan to be body which the plan will govern.
	The plan should follow the format laid out in the Legislation The purpose of a Yarra Strategic Plan is to— (a) guide the future use and development of the Yarra Strategic Plan area; and (b) identify areas for protection within the Yarra Strategic Plan area.	

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<p>(a) contain the long-term community vision document developed for Yarra River land under section 17; and (b) set out the broad objectives of a Yarra Strategic Plan and the values that it seeks to recognise, protect and promote, including environmental values, landscape values, cultural heritage values and amenity values; and</p> <p>(c) contain performance objectives for waterway health, river parklands amenity, landscape amenity and environmental, cultural and heritage values to be achieved over a specified period in relation to Yarra River land; and</p> <p>(d) identify regional infrastructure networks; and</p> <p>(e) identify projects for the protection and improvement of Yarra River land that should be carried out at the earliest opportunity; and</p> <p>(f) set out a narrative description of the river corridor; and</p> <p>(g) set out a decision-making framework against which individual projects and proposals may be assessed or evaluated; and</p> <p>(h) state the parts of a Yarra Strategic Plan that are intended to be binding on responsible public entities and the parts that are in the nature of recommendations to which responsible public entities are only required to have regard; and</p> <p>(i) cover any other matter relating to waterway health, river parklands amenity, landscape amenity or environmental, cultural or heritage values that the Minister, by written direction given to the lead agency, directs is to be dealt with by a Yarra Strategic Plan.</p>	<p>The draft strategic plan doesn't not include a several of the numbered points. The performance objectives should follow the items stated in the act</p> <ol style="list-style-type: none"><li>1. waterway health,</li><li>2. river parklands amenity,</li><li>3. landscape amenity and</li><li>4. environmental,</li><li>5. cultural and</li><li>6. heritage values</li></ol> <p>Alternatively with the themes of the protection principles in the Act:</p> <ol style="list-style-type: none"><li>1. General</li><li>2. Environmental</li><li>3. Social</li><li>4. Recreational</li><li>5. Cultural</li><li>6. Governance</li></ol> <p>In general the YSP needs to be better aligned with the Yarra/Birrarung Act.</p>

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7	Ten-year performance objectives	These are aspirational intentions rather than performance objectives. The intentions are good. It is, say, important to improve water quality and achieve greater biodiversity. The objectives do not, however, set performance standards to be met in 10 years and they are not measurable as objectives. The draft document does not explain why these performance objectives were chosen. The performance objectives must be SMART and based on the environmental indicators in the State of the Yarra and Parklands report. This report should be used to establish baselines against which the performance objectives can be measured.
8		What should go into which of the two parts is not articulated. How are they differentiated? The title of the first part is unclear: 'Working together to achieve the community vision' is hopeful but vague.

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8		<p>The format of the contents of Part 1 should follow the layout in the legislation:</p> <ul style="list-style-type: none"><li>'(a) contain the long-term community vision document developed for Yarra River land under section 17; and (b) set out the broad objectives of a Yarra Strategic Plan and the values that it seeks to recognise, protect and promote, including environmental values, landscape values, cultural heritage values and amenity values; and</li><li>(c) contain performance objectives for waterway health, river parklands amenity, landscape amenity and environmental, cultural and heritage values to be achieved over a specified period in relation to Yarra River land; and</li><li>(d) identify regional infrastructure networks; and</li><li>(e) identify projects for the protection and improvement of Yarra River land that should be carried out at the earliest opportunity; and</li><li>(f) set out a narrative description of the river corridor; and</li><li>(g) set out a decision-making framework against which individual projects and proposals may be assessed or evaluated; and</li><li>(h) state the parts of a Yarra Strategic Plan that are intended to be binding on responsible public entities and the parts that are in the nature of recommendations to which responsible public entities are only required to have regard; and</li><li>(i) cover any other matter relating to waterway health, river parklands amenity, landscape amenity or environmental, cultural or heritage values that the Minister, by written direction given to the lead agency,</li></ul>
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	Importance of collaborative action Improvement in the health of the Yarra River requires collaborative actions	Agreed. I question the composition and size of the committee. Are all agencies required such as the VPA and VicTrack and the Department of Transport as core members of the YCC. Input is important from these entities but are their core function reflective of the intent of the act?
12		Wurundjeri water policy not available online. Yet it is a foundation document for this plan.
14	Impact of climate change outline	Agreed with the impact of climate change. The impact of urbanization needs to be strengthened with an explicit reference to impermeability and the impermeability and the impermeability index. Stormwater quality and flow are the biggest threat to the river. Increased population also has other impacts such as the increase in disturbance, light and noise, for example, the numbers of mountain bikers will increase.
14	“... using the State of the Yarra and Parklands report as a benchmark for progress”	This idea is supported strongly and must be more clearly implemented in the report and used as a baseline for the performance objectives.



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15	'As a 10-year strategy. The Yarra Strategic Plan sets the foundation to achieve the Yarra 50 Year Community Vision ...'	I support this. The 10 years needs to look to the 50 years. What is Melbourne and the Yarra Valley going to look like in 50 years. How many vineyards and wineries might there be? Where are the growth areas that will impact on the Yarra, especially brownfield? What development will happen in the Suburban and Inner City Reaches? Will there be more roads next to and bridges across the river in 2050, or fewer? In 2030 Melbourne's population will be 6 million and in 2050 it will be 8 million. Will it plateau by 2070? We don't have answers, but these issues need to be considered in asking what is realistic in the performance objectives. How are we going to balance access and protection? To sustain the health of the river what areas do we need to protect now? As aspirational ideas I support the thinking behind the Performance Objectives. We need better water quality and greater biodiversity in 50 years' time. How will that be achieved though? What do we need to do now?
17		How is collaborative action to be maintained in the long term? Over the 50 years of the plan? How will investment be co-ordinated. The content of Part 1 needs to be better articulated. It's function in the plan is not clear from its title? What goes into Part 1 and what goes into Part 2? How is that decided?
	<b>Part 1: Working Together to Deliver the Community Vision</b>	Is the community part of this working together? How?

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20-2 7	Current investment	I question the value of the inclusion of current investment. This seems to a matter of marketing business as usual. The community is looking for the transformative in the YSP. This would be worth doing if it was analysed in terms of the protection principles in the act and a net gain for the environment be applied to all projects, such the fireworks mentioned by the City of Melbourne, the Warburton Mountain Bike Trail, the Main Yarra Trail. I query why a road project was included - The Jumping Creek Road Stage 1B upgrade. These projects need also be tied into the proper environmental baselines to be established in the YSP.
27	Birrarung rangers	I strongly support this initiative. There should be rangers for each section of the river, modelled on the work done in Darebin Creek, to create collaboration between business and private landowners and investment on each reach of the river.
28-2 9	Existing mechanisms for managing the Yarra	This needs to be restructured to put the HWS and State of the Yarra and its Parklands at the front of the list and articulate how these two reports will connect with the YSP. They are the two key reports. The HWS needs to be tied into the collaborative governance and its targets used to contribute to baselines in YSP. The environmental indicators in the State of the Yarra need to be used to create key baselines. The Index of Stream Conditions needs to be referenced to also help establish the current health of the river.

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30		<p><i>Living Melbourne</i> is included and therefore should not the Biodiversity Strategies of each of the councils be included, noting in particular the Biodiversity Links in Stonnington and the Backyard Biodiversity in Boroondara. As assessment of the relative opportunities for ecological enhancement needs to be made for each council area.</p>
33-4 1	Wurundjeri-Woi Wurrung People and Custodianship of the Birrarung	<p>I support the aspirations of the Wurundjeri-Woi Wurrung People. I support their appreciation of Caring for Country. I note that there are significant places on the river that need protection that are not mentioned here. Caring for biodiversity is part of Caring for Country. It is not only species richness but also abundance that is important. I acknowledge that wildlife has cultural significance. Culture requires healthy populations of culturally significant species in the catchment. I acknowledge the importance of cultural flows. Should not the sites of significance be extended to all sites mentioned on page 68-69 including Wurundjeri-Woi wurrung sites for protection?</p>
44	‘Protecting biodiversity and ecological integrity is paramount ...’	<p>Endorse. Diversity is not only species richness but also abundance of particular species.</p>
45	‘Priority Projects will be developed for the final plan.’	<p>There has been adequate time given the delays in the release of the plan for these priority projects. There is an obligation under the act for the community to have input and be consulted about the priority projects.</p>

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45	'The decision-making framework is still in draft'	It is hard to make an appropriate assessment of the draft YSP without the decision-making framework (DMF). It may have answered some of the questions raised here in this submission. It is critical for the community to be able to assess and contribute to the DMF. There is an obligation under the act for the community to have input and be consulted.
46	'Implementing the land use framework through planning schemes will ensure that the land use and activities, including [importantly] on private land ... to deliver on the Yarra Strategic Plan's performance objectives.	Support the importance of the Land Use Framework and a rolling plan to include amendments in planning schemes.
46		I support Melbourne Water being appointed the Lead Agency. I query the current structure of the YCC. I do not believe it is an effective way of making decisions. The Lead Agency needs to be responsible not the YCC. The size of the YCC needs to be reduced.
48	Improve water quality Achieve greater biodiversity	Endorsed. Water quality needs to include organic particulate matter that is currently being trapped behind dams and weirs. The flow needs to have adequate food for invertebrates to sustain an abundance of macroinvertebrates.
		How will the YSP restore billabongs and undertake complementary works?
		How will the YSP strengthen terrestrial and aquatic habitats? Strengthening needs to include species richness and abundance of particular species.

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48	'Priorities include''	Generally, for all four items. Why were these selected as priorities? Where is the explanation as to why these four will 'strengthen aquatic habitat corridors between the Yarra and its catchment?
48	'Watsons Creek (area for protection)	This is a project that is already largely completed. Why is it more significant than others? Overlapping use of language: 'Priority projects' 'Significant Places' 'areas for protection
48	'Gardiners Creek (celebrating significant places)	Puzzling why a partly concreted creek with the poorest water quality on the Yarra, overshadowed in part by the freeway should be included in a healthy river and lands. The confluence is not within the Yarra River Lands. As a 'celebration' should this not be in Performance Objective 2?
48	TO aspirations	The four items are all items that are of broad concern to the community and not only (and rightly) of concern to the TOs.
54	Dredging	Do not support comprehensive scale dredging. Dredging is expensive and adds to our current crisis of waste disposal. Activities that have specific need to fund targeted dredging.
54	Extend parkland network	Support. This needs to become part of the LUF and be targeted to existing POAs, as well as opportunities such as the Yarra Valley Country Club where the developers are already willing to contribute land into the public realm.

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54	Kayak/canoe access points	Existing points need to be improved rather than new ones established. Safety needs to be considered in developing access points. I support the development of a canoeing hub above Princes Bridge on the south bank.
56	Performance Objective 4 Protecting the natural beauty	This needs to be done through the identification of viewsapes and continuous viewsapes such the Boulevard. Skylines need to be carefully assessed. There of views of the city that need to be maintained, such as the feeder road from the Boulevard to Johnston St on south side. And natural or almost natural viewsapes such as from the Boulevard on the north side beyond the feeder road from Johnston Street. There are still parts of the city which preserve natural skyline views. These need to be preserved where possible. There are also viewsapes from bridges that need a critical assessment as to when. These naturalistic views benefit cyclists and drivers. They create a greenscape experience
	Actions Responsibilities and Targets	All the goals are ten-year goals and they need to be articulated and built into 3 year rolling implementation plans. There needs to be ongoing community consultation for each of the 3 year rolling implementation plans.

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58	1. Restore billabongs	This needs a baseline and a measure that is cumulative over the 10-year period. Say a specified length of river corridor every 3 years. This is not a short term, but a short, medium and long term. This needs to involve community and private landholders. There needs to be a parcel by parcel land ownership analysis and it needs to be tied in to the HWS.
	2. Strengthen terrestrial and aquatic habitat	This needs a baseline and a measure that is cumulative over the 10-year period. Say a specified length of river corridor every 3 years. This is not a short term, but a short, medium and long term. This needs to involve community and private landholders
58		Query inclusion of Gardiners Creek.
58	Behaviour change campaign	Must target business. 7% of household waste is polystyrene and 50% of the litter in the river is polystyrene. Not a short-term goal
58	Pesticides	Support enforcement of regulation to reduce pesticides and chemicals entering the waterway. Education has not been demonstrated to work.
58	Implement Stormwater MAC recommendations	This should be a short-term goal not long term. It is something that can be done by government. Now with the current state of development is when these recommendations must be implemented.

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59	Performance Objective 2: A culturally diverse river corridor	This is poorly worded. If it is to be focussed on the TOs, it should be reworded. That is not about diversity that is about recognition of what is in terms of culture. Note in terms of diversity one might consider the Greek, Italian and Vietnamese fishermen who bring a cultural commitment to fishing on the river. Fly-fishing and fishing with spinners, as part of the Anglo-Scottish culture is also worthy of consideration. Historically, there is a lot of historic culture from settler periods that while often well recognised needs to be continuing to be understood in terms of the history of the river.
59		Throughout this plan there needs to be opportunities created by the YCC for ongoing income for the Wurundjeri.
60		See earlier comments
61	Performance Objective 4: Protecting the natural beauty of the Yarra River Corridor	
61	'improving public access'	The river's landscapes are not enhanced by improving public access. The river's landscapes are enhanced by controlling inappropriate development at viewscales and on skylines. Improved access unless bound by the net gain principle may well cause a decline in the natural beauty of the river. Trails need to be carefully considered, both new trails and the expansion of existing trails as they may lead to a deterioration of the natural beauty of the river.



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61	<ul style="list-style-type: none"><li>All actions are subjective to funding</li></ul>	The YSP needs to drive innovative ways of delivering more funding for the river or it has failed. The application of the net gain principle is clearly an opportunity.
61	Each performance objective will ...	Targets need to have a section of its own. This section needs to be better integrated with the HWS and be additive to the HWS
61	'Number of hectares ... that connect	Needs much more detail
61	Inundation	Billabong health is much more than inundation.
61	A culturally diverse river corridor	Measure should be the number of sites protected formally and invested in.
61		Target should be number of proper income-generating opportunities for TOs.
	Protecting the natural beauty of the Yarra River corridor	Viewpoints and landscapes need to be identified, celebrated and protected.

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	Part 2 Land Use Framework	Need to have timeframes added for initiatives - short, medium or long.
		Need to have over-arching - Great Birrarung Parklands identity - with consistency in signage and presentation on Yarra River Lands. Prepared in consultation with the Wurundjeri (with proper compensation).
64	'The Yarra at the Centre of Planning'	A laudable goal for the YSP
64	Application of the land use framework	The YSP needs to be incorporated not referenced in planning schemes. No such things as 'strategic objectives' in the legislation or elsewhere in this document
64	'public entities will align their business-as-usual activities to the recommendations of the land use framework'	How will this happen?
65	'Refine and introduce permanent design and development and landscape management controls between Richmond and Warrandyte ...'	YRKa is very supportive of this action. It is of critical importance.
65	'Prepare new planning controls which extend upstream from Warrandyte to the Yarra Ranges ...'	
65	'Review the Yarra River's heritage values and protections and update or introduction of new planning controls, such as the Heritage Overlay, to protect sites of significance.'	

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65	‘Identify areas of high riparian and biodiversity value requiring protection from disturbance and introduction and/or updating of appropriate planning controls such as the Environmental Significance Overlay to these or other high-priority revegetation sites.’	This is critical for the environmental outcomes of the act. Areas for protection must be recognized and those protections enforced. These areas may or may not be on private land. Private land provides opportunities as sites may be relatively undisturbed, however these sites need protection through the planning system. The conflict between river access and protection from disturbance needs to be clearly articulated.
65	Develop new guidelines to support appropriate landscape design and native planting at the river’s interface	Supported firmly.
66	Bush residential	Rename as misleading
66	‘continuous corridor of native vegetation along the Yarra and its tributaries’	This should be continuous in ‘Bush Residential’ and in the Suburban reach. It should include a recognition of a habitat component and consideration of the Yarra as a wildlife migratory corridor, and an opportunity for migration of seeds upstream as the climate warms. Opportunities for building migratory connectivity should be assessed in the Urban and Central City areas.
67, 68, 69	Significant places	The significant places need to be made clearer in the writing of the plan. A list is essential, potentially numbered. The
67	Significant places	There is a contradiction in promoting biodiversity and access and expanded activation. Significant sites need to be assigned to outcomes.

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67, 68, 69		Add to significant places: Haining Farm, Warramate Hills Nature Reserve, confluence of Woori Yallock Creek with the Yellingbo Conservation Reserve. The Yellingbo Conservation Reserve must be included as it is an ongoing collaboration between the community and public entities. Collaboration is most effective and most robust over time when it includes community. This also provides a connection and migratory corridor with the higher land around Gembrook. Propose deleting Gardiners Creek Confluence (concrete lined and overshadowed by freeway).
	The Upper Rural Reach	Query whether this should be called rural as it understates the significant portion of bush and National Park along and near the river.
73		Ensure any expansion of access does not reduce environmental and biodiversity values or compromise the value of the Yarra as a migratory corridor for wildlife.
73	Update of relevant overlays	Support. Short-term goal
73	Restore and protected depleted sections, establish continuous vegetation buffer along the Yarra's edge, strengthen vegetation [and habitat] across the broader landscape and along tributaries	Strongly support. Replanting needs to be done with the creation of habitat in mind
75		Support initiatives for the Upper Reach. Confluences need to be celebrated.
75	Protect, rehabilitate and reengage floodplains, wetlands and billabongs ...	Strongly support

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75		Include initiatives to support community work. Consider appointment of a river officer for each reach to stimulate collaboration between public agencies and the community and business, and to support community work
75		Include pest animal element, including cat control. Include open season on deer at all times of the year.
76		Consideration must be given to including traditional 'cool burning' as a preferred tool in managing vegetation and fuel loads under the Bushfire Management Overlay. This helps ensure vegetation removed is not replaced by highly flammable species and keeps the leaf litter intact and resistant to weed invasion. The act stated the LUF 'recognise projected climate change impacts, flood risks and bushfire risks'. The changed vegetation since 1835 has contributed to bushfire risk.
76	Warburton	Include stormwater management and IWM principles as proposed for Yarra Glen township
	<b>The Lower Rural Reach</b>	
82	'access is limited'	There are three access points along the Yarra in this reach which is sufficient. The quality of the access needs to be assessed and the downstream safety of canoeing at low flows needs to be assessed. To be consistent in the plan, current access points need to be improved not new access points established.

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84	'a wide mature cloak of indigenous vegetation' 'People visit the river in key locations' River is replenished by plants and animals from Kinglake and beyond' 'Bring improved biodiversity ...' 'Preserve the rural and bush character	Key parts of the Community Vision
	In the next ten years	
85		Support focussing on existing opens spaces for access. Invest more in fewer spots, rather than spread over many places. Support open access near towns. Part of the mystery of the river is its inaccessibility in places. Access opportunities needed to be graded in difficulty. Some parts are very difficult to access, and others take an effort to access while yet others provide easy access.
85	New protection for billabong systems between Warrandyte and Yering ... statutory protection'	Support.
85	Support conservation initiatives in the Watson's Creek corridor	These needs to about new initiatives that capitalize and extend existing initiatives. Otherwise it is advertising business-as-usual.
85	... the review and update of relevant overlays'	Support
86	Melba Highway re-alignment	Drawn on map but not discussed anywhere else in plan. Potentially significant impacts. Also, net gain for the environment opportunity, as well as an application for the Yarra River Protection Principles.
87		Support Wurundjeri significant places

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87		Need to co-ordinate the protection, rehabilitation and re-engagement of flood plains, wetlands and billabongs ... in the first three reaches, noting that there are significant wetlands in the Suburban Reach, which are in public hands.
88	Yarra Glen	A master plan for Yarra Glen needs to be developed that maximizes its historic feel and connects the town with the Yarra. Yarra Glen should be a centre point for the history of the Yarra Valley
		The upgrade of the boat access needs to consider this access point as part of a canoe trail, with appropriate precautions for times of low flow.
90	Billabongs	Strongly support billabongs between Tarrawarra and Yering as new areas for protection. They have relatively good environmental values that with the right planning instruments can relatively easily be improved to high. The presence of water and connectivity to the river make them a prime opportunity.
		Endorse preparation of a landscape assessment. It is also necessary to map the ecological values of particular billabongs and which produce the highest impact for restoration, to create a staged plan of protection and improvement. Identify which agencies are to develop assessment.
92	Strengthen planning scheme controls/Extend Yarra River Planning Controls.	Yes. Provide time-frame - short
92	Add formal protection in the planning scheme	Yes

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92		Encourage landowners to covenant wetlands and to gift land to the crown for co-ordinated protection.
92	Significance of Brushy Creek confluence	Consider Wurundjeri able to control access to site, in recognition of sacredness.
93	Watson's Creek Biodiversity Corridor	Selected because it is part of two programs already. River to Ranges and the Sugarloaf Link project. Yet River to Ranges before the final plan will be published. How is Watson's Creek going to demonstrate modern governance of co-ordination and collaboration. Sugarloaf Link funded to June 2021. Argue for ongoing funding of these projects? Is there a distinction between grant giving and modern governance co-ordination and collaboration? Part of Great Birrarung Parklands
94	Suburban Reach	
	'A near contiguous network of parklands along the Yarra's edge defines this reach.'	Opportunity to establish GYUP/Great Birrarung Parklands as a vision and as
		Useful to have a map of community groups included, right along the waterway in all reaches



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94	Heidelberg Structure Plan	Ensure that there is adequate consideration of the ecological values of the Yarra/Birrarung in the structure plan. This is an opportunity to employ 'collaborative planning processes. The structure plan must exemplify best practice in co-design and collaboration with the community.
94	Bullen Precinct Plan	Has been delayed and needs to urgently be re-initiated.
98	'A covenant of custodianship is adopted by private landowners'	This element of the Community Vision needs to be explored as an unfolding mechanism over the 10 years. How could covenanting be encouraged in the Planning Schemes?
98	'Expand the river's local parklands', 'establish new habitat' and 'collaborative planning processes'	Key parts of the Community Vision
98		Consideration must be given to working with golf courses and maintaining the ecological benefits of golf courses. This needs to be included in the management of council-run golf courses and in the overlays controlling privately owned golf courses. Incentives should be provided for golf courses to minimize nutrient and chemical runoff and to support habitat.
99	Minimize impacts ...	Support changes to Planning Schemes. Are there anyway the planning schemes through a net gain for the environment deliver a positive outcome beyond minimizing impacts?
99	Strengthen landscape buffer	Supported with inclusion of habitat considerations and migratory patterns of wildlife into the hinterland and longitudinally upstream and downstream.

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99	New landscape guidelines	Strongly supported especially with mandatory elements to protect views.
101		Support these initiatives
101	Add to 'Significant Places'	The area down stream of Bond Street that includes the ancient red gums, a representative example, or simulacrum, of the pre-1835 landscape, and the novel ecosystem of the Murundakah wetlands with the opportunity to expand these wetlands to include the Montpellier wetlands, and to co-ordinate with Rosanna Golf Course downstream.
102		Support. This is mostly oriented to landscape and views. That is important but there needs to be an explicit consideration of the ecological values of the continuity of vegetation along this reach, and the vegetation as habitat. Particular species need to recognize in the planning schemes
104		Brand as part of the GYUP/Great Birrarung Parklands. Access to Warrandyte State Park is currently at an acceptable level. It is a natural 'island' and needs to be protected as such
104		Not only protect but promote Wurundjeri culture. This is like all culture always changing and growing.
106	'Develop a masterplan for Murundaka and Montpellier wetlands'	Endorsed! And make this a significant place recognized in the VPP. The master plan needs to balance access with disturbance

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108	Bulleen Precinct Land Use Framework	This has inexplicably been delayed. The YSP needs to advocate for its completion as an exemplar piece of work on the Yarra. This area needs to be protected and the maximum open space taken into public land that is possible. The Yarra Valley Country Club floodplain land represents a generational opportunity to expand the public lands on the river.
108	Bolin Bolin billabong	Bolin Bolin needs to be enhanced, noting the risk of groundwater drawdown from the NE Link.
110	Yarra Bend Park	The park is a key link in the chain of biodiversity sinks along the river. It is under particular pressure of intrusion as the nearby population increases rapidly. Where access is allowed in some parts, other parts, say Galatea Point, need to be protected and casual and damaging access excluded. Mountain bikes are a particular issue for the park. The damaging influence of uncontrolled mountain bike access needs to be stated in the YSP and management planning encouraged to manage this threat.
110	'Extend native riverbank planting into adjacent areas ...'	This concept needs to be expanded to the whole of the reach and included on page 101. Boroondara's Biodiversity Corridors program needs to be used as a model applied to other councils. These corridors need to be recognized in the planning scheme.
	Inner City Reach	
114	Community vision: 'Expand connected ... parklands' 'position the river as an environmental educator'	

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115	'urban wilderness'	This is an oxymoron.
	'protect and strengthen biodiversity hotspots'	Supported. There are protected or semi protected areas along the river, including the Governor's gardens and in part, the Royal Botanic Gardens. This area should include thinking around it being a biodiversity hotspot. Fences will continue to be needed to keep our predators. There may be opportunities to re-introduce native wildlife. The Gardens should celebrate habitat as well as plants. Herring Island is another protected area to which access needs to be controlled. A bridge across to the island would reduce the value of the island as a biodiversity hotspot and result in more pests and more disturbance.
115	Gardeners Creek Confluence	It is puzzling as to why this was included as a significant place. The creek is a concrete drain, overshadowed by the freeway and sandwiched between two large chunks of private land. The public do not have access to the confluence.
117	'Strengthen habitat links ...'	Supported, including vegetation initiatives and the inclusion of ecological components.
117	'Ensure a co-ordinated to landscaping ...'	This in essence is the GYUP/Greater Birrarung Parklands and it needs to be identified as such and applied in every reach. The notion underpinning the GYUP is the connectedness of the river parklands

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	<p>‘Improve connections’ ‘Connect the recreational trail network between Flockhart St and Gipps St’</p>	<p>The areas covered by POAs need to be highlighted and active efforts made to connect the trail on the ‘south bank’ between Walmer Street and Collins Bridge. Any works need a ‘net environmental gain; and comply with act principles. The access at Collins Bridge needs to be addressed.</p>
119	<p>‘The Plan should also articulate how a change of use at the Carlton United Brewery site ...’</p>	<p>This is strongly supported</p>
119		<p>The dilapidated state of the industrial heritage at Dight’s Falls needs to be noted and addressed.</p>
121	<p>‘Support the role of Burnley Harbour and Wetlands and Loys Paddock ... as biodiversity hotspots’</p>	<p>Strongly endorsed. This could be a site for a lowline green space between the freeway that makes these sites a connected. Consider relocating Parks Victoria sit to Fishermans Bend or Docklands and freeing the harbour to be parkland.</p>
121		<p>Support the Yarra River Biodiversity Linkages project and use it as model to be applied in other municipal areas. The opposite bank in Yarra needs to have the same style of project applied and this could come out the Burnley Harbour Project, if the two concepts are co-ordinated.</p>
122	<p>‘Set out a coordinated approach to design ...’</p>	<p>This should be applied across the whole corridor to every reach.</p>
122	<p>‘... Yarra River as a transport corridor ...’</p>	<p>Acknowledge conflict between rowing and using the river as public transport There are already adequate and underused facilities for commercial vessels.</p>

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122		Consider appropriate commercial zoning for the rowing clubs on the south bank of the river.
122		Further strengthen controls on overshadowing on either bank of the river and maximize sunlight opportunities for the north bank of the river.
		The section 'Opportunities for future projects and alignment' should be included for every other reach in the plan. The thinking in this section such as 'Plan public investment' and 'Set out a coordinated approach to the design of the public realm'
	There are a number of items in particular reaches that should be extended to the whole-of-river	For example: 'A continuous vegetated corridor' and 'Ensuring a co-ordinated
		Though not formally part of the plan. There should be an additional section addressing the estuary proper and how this can be coordinated as part of the GYUP/ Greater Birrarung Parklands. There needs to be an estuary scale assessment of fish stocks and fishing opportunities extending to Dights Falls. If the Yarra/ Birrarung is to be considered a single living and integrated living entity, then its junction with the bay need to be considered. For example, the grayling matures in the estuary but lays eggs in the riffles - that is symbolic that connectivity is a key part of the river as the legal/cultural personality created in the act.