

# YARRA CITY COUNCIL PRELIMINARY SUBMISSION TO THE DRAFT YARRA STRATEGIC PLAN

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## 1. Introduction

This is a preliminary submission made on behalf of Yarra City Council (Council) and provides Council officers' response to the draft Yarra Strategic Plan (YSP).

Yarra City Council endorsed the draft YSP for the purpose of undertaking consultation, it is still to consider the draft YSP and endorse a formal submission. Council looks forward receive information on the feedback and issues raised through the community engagement and any responses proposed by Melbourne Water.

Council notes that the required Decision Making Framework, Priority Projects and the details of what matters are going to be binding on RPEs are not included in the draft YSP and expects that further consultation will occur with RPEs as part of finalising these components of the YSP.

## 2. General

Council's involvement with developing the YSP goes back to the Ministerial Advisory Committee and the preparation of the *Yarra River Action Plan*. Council has supported the key directions to manage the Yarra River as a single living entity, protect its environmental values, bring about integrated coordinated actions and recognise and protect the cultural values of Traditional Owners and their involvement in the on-going management of the river through new modern governance arrangements.

The *Yarra River Protection (Wilip-gin Birrarung murron) Act 2017* (the Act) sets out the overall management framework and the content of the Yarra Strategic Plan and this has guided the process for preparing the draft YSP as well as its content.

Generally, the directions and actions contained in the draft YSP are supported, however, there are aspects that need further consideration. The key points in Council's submission are:

- There is an expectation that the YSP should have ambition and is transformative in its directions and actions, rather than following a business as usual (BAU) approach and this needs to come through more strongly in the draft YSP ;
- The content of the draft YSP needs to be reviewed to ensure it fully satisfies the requirements of the Act;
- The draft YSP needs to provide not only high level general directions but also a level of detail that provides sufficient understanding of how the directions will be addressed and the agency responsibilities for pursuing actions when the YSP is implemented;
- The draft YSP would benefit from an explanation of the future governance and implementation arrangements. This involves nomination of the lead agency, annual implementation plans, the future role of the Yarra Consultative Committee and funding;
- Some further clarity is needed regarding the inter-relationship of the YSP with other strategies, especially where there is a reliance on other strategies to meet the community vision, performance objectives, actions and targets in the YSP. This is particularly relevant for

directions that depend upon actions beyond the YSP lands (1km) for such things as water management, water quality and urban planning;

- The draft YSP has limited content on aspects such as water quality/management, habitat protection and connectivity and biodiversity.
- The draft YSP needs reviewing to ensure consistency in actions across the content in Part 1 of the draft YSP and the Land Use Framework.
- There is a necessary inter-relationship between the YSP and the Victorian planning system if the Yarra River is to become central to planning decisions. Greater detail is needed regarding the content and form of changes to planning schemes, particularly as a regional policy.
- The YSP is a long term plan however many of the action timeframes are programmed for a long time ahead. It should be possible to consider more ambitious timeframes that might include initial and intermediate steps and simultaneous work occurring over earlier timeframes.

Further explanation of these points is made in this submission. Officer comments consider the draft YSP Part 1 but in respect to the Land Use Framework are confined only to the Suburban and Inner City reaches which affect the City of Yarra.

### **3. YSP – 10 year plan delivering the 50 year community vision.**

The YSP is founded on recommendations from the Yarra River Action Plan and it needs to fulfil the requirements of the *Yarra River Protection (Wilip-gin Birrarung murrong) Act 2017*, as well as being informed by and support the outcomes in the 50 year community visions and the Nhanbu nattun ba ngargunin twarn Birrarung (Spirit and Lore of the Yarra). In addition to this the draft YSP identifies the key issues confronting the lower reaches of the Yarra River are river pollution, unprecedented population growth, and climate change which are said to require “significant intervention”. Together this builds an expectation of ambition and a different way of conceiving the planning and management of the Yarra River as a single living entity through modern governance and management arrangements.

The test of the effectiveness of the draft YSP is whether it will deliver or sets a pathway for delivering on these ambitions and addresses these fundamental issues. At the moment the draft YSP could express greater ambition in its actions.

It is considered that the consultation and engagement that occurred has effectively captured the community vision, priorities and values for the whole of the Yarra River and each of its reaches. These are supported by Council.

### **4. Strategic documents**

The draft YSP sets out a number of state government strategies across various policy matters such as biodiversity, water quality & management, planning and open space that are relevant to the preparation of the draft YSP and indeed are relied upon to achieve the vision, objectives, actions and outcomes in the draft YSP. There is a significant task in bringing together not only the wide ranging policy documents but also the multiple government agency response and commitment to the YSP – effectively bringing together a whole of government approach.

There needs to be clearer understanding of the inter-relationships of these strategies and the draft YSP especially where they are being relied upon to support and deliver the YSP. While the draft YSP indicates that the *State of the Yarra and its Parklands* report will provide a “comprehensive baseline for the environmental condition of the Yarra River Corridor” and there is some other cross referencing to strategies found in the performance objectives and actions, it doesn’t occur for all strategies nor is it necessarily clear how these strategies are integrated with the YSP. The effectiveness of the YSP will depend upon integrated and collective actions across agencies and policy settings. Therefore, Council considers it important to ensure integration across strategies to bring about a ‘whole of government’ approach is clear.

#### **5. Yarra Strategic Plan Part 1 Working together - YSP Performance Objectives and actions**

The draft YSP sets out six key principles based on the principles sets out in the Act and four performance objectives that guide the YSP and the new modern governance approach. Actions and targets are set out for each Performance Objective.

This submission considers and provides comments on each of the performance objectives and recommends changes to the outcomes specified under the performance objectives. In general the Performance Objectives are supported however there needs to be greater alignment between the outcomes proposed under each performance objective and the actions and targets. That is, do the actions achieve the Performance Objective outcomes?

It is suggested that the structure of the draft YSP could be improved by reconfiguring it by bringing together the performance objectives and their actions and targets to form a more integrated and easily read document. In their current form they are disjointed.

The connection between the performance objectives, the outcomes specified and their actions is important. Currently the actions are a mix of actions, strategies and objectives. In some instances there is no clear action supporting the propose outcomes, for instance, extending the parkland network. It is recommended that the actions are reviewed to follow a consistent structure and to be clear what is expected and ensure that they achieve the nominated outcomes. This may mean that some actions that are expressed as strategies or objectives need to spell out in further detail what actions will occur to support them.

It is recommended that the timing for the actions are reviewed to incorporate more opportunities for shorter term actions. Recognising that not everything can occur on day one, there still seems to be opportunity for progressive and intermediate actions that can progress work in the shorter term while still respecting that there are lead-in times and resourcing that may take time. For example, it seems odd that actions for septic tank and wastewater management are timed for the long term when it could be expected that education and awareness campaigns could occur earlier.

The following comments are provided for each of the performance objectives as well as their proposed actions.

##### *Performance Objective 1 - A healthy river and lands.*

- a. There are other opportunities for strengthening habitat corridors within the Inner City and Suburban reaches that officers consider should be included in the draft YSP such as the Merri and Darebin creek confluences, Dights Falls, Yarra Bend Park through to Alphington.

*Performance Objective 2 - A culturally diverse river corridor*

- a. Recording the river's cultural values for Traditional Owners is supported as a high priority as this will assist in understanding the overall story of the Yarra River as well as providing important foundation information for protecting sites, providing interpretation and greatly assisting land managers in their understanding and respect for the cultural values and places of significance. Further detail is needed setting out the actions needed to support this work.
- b. The idea of interpretative and educational programs for specific sites is supported. It is recommended that the three adjacent sites of Abbotsford Convent, Dights Falls and the Merri Creek confluence are treated as one for the purpose of the interpretative and educational programs.
- c. Nominating sites for pilot programs may need the development of an overall narrative framework or approach to bring about a whole of river understanding and coordination to these pilot programs.
- d. It is suggested that Actions 2 & 4 under Performance Objective 4 are more relevant to include under Performance Objective 3.
- e. A further recommended short term action should be reviewing and completing any gaps in existing heritage studies.

*Performance Objective 3 - Quality parklands for a growing population*

- a. There is a need to understand the purpose of establishing a sub-committee of the YCC and its priorities. In the first place, there needs to be understanding of the strategic direction and purpose for the Greater Urban Park Lands and their role within the metropolitan and regional open space network.
- b. If a holistic 'single entity' approach is expected it is considered necessary that the various site and reach actions are tied together across the Greater Parklands to ensure outcomes are coordinated and integrated as a single entity. The approach proposed for an overarching Recreation Strategy is an example of what could occur which could equally apply to vegetation and habitat corridors and river access.
- c. Improved access to and along the Yarra River corridor is needed and should include connecting gaps in the recreational and commuter trails. These gaps need to be identified in the short term to support ways of completing the network.
- d. There is no specific action supporting the extension of the Greater Urban Park Land network. Nor is the purpose of any extension clear. Clarification is also needed about whether 'extending' includes additional new open space or just designating additional existing open spaces to the Greater Parklands. The provision of additional open space is a critical issue within local communities and needs addressing in response to Melbourne's population growth and climate change. Accordingly, there needs to be additional actions included in the draft YSP supporting this proposal. Identifying potential opportunities would be a first step towards this.
- e. Yarra Bend Park is a very significant area of parkland and has an important role within the inner metropolitan area. It offers opportunities for improvement including revegetation, habitat protection and recreational needs. Council considers an action should be included to develop a new master plan for the Yarra Bend Park that provides direction for the parklands in the future.
- f. Council considers that there needs to be further direction and actions in the YSP supporting strategic land purchases and the introduction of land acquisition overlays to support the

access network, expand the capacity of the Parklands to meet community needs and protect significant sites and areas of environmental significance. Direction and action is needed before opportunities are lost.

*Performance Objective 4 - Protecting the natural beauty of the Yarra River corridor*

- a. The performance objective should not be seen as just referring to the aesthetics of the Yarra River and should also include protecting the environmental values and qualities of the Yarra River.
- b. Additional actions are needed to support habitat protection and enhancement and increase the biodiversity of the river corridor. This includes opportunities for improved habitat links and connections.
- c. Climate change is identified as one of the key issues affecting the Yarra River. The draft YSP needs to include clearer actions that will address this issue.
- d. Planning actions are needed to support the statutory protection of places of cultural heritage, biodiversity and habitat significance. Some actions are already outlined in the draft YSP under 'whole of river directions'. (p.65)

## **6. Targets**

The draft YSP provides a set of targets for each of the Performance Objectives and indicates that these will be refined with input from the community and Traditional Owners during the public engagement. The revised targets need reviewing to be specific and clearly align with the actions.

## **7. Land Use Framework (LUF)**

The Land Use Framework purpose is to make the Yarra River a central part of land use planning and decision making and provide the spatial directions for the YSP. Its aims are detailed further in the draft YSP.

The LUF is structured around the four reaches of the river, as set out in the draft YSP, and includes a community vision, priorities and values and directions for land use and development supported by a plan for each reach.

The comments in this submission relate to the Suburban and Inner City reaches that cover the City of Yarra.

The connection between the draft YSP and its Land Use Framework and the broader Victorian planning system and how they work together is unclear. The YSP needs to be supported through planning schemes by providing statutory implementation and force to the YSP. Ideally, planning schemes mechanisms should be used so that key directions are clearly integrated with the planning schemes rather than sitting outside the statutory planning system. What is relevant to planning decisions should be in the planning scheme. In this regard Council supports the planning proposals specified in the 'whole of river directions' and supports clearer implementation actions and details in terms of state, regional and local planning policy and through various overlays such as design & development, heritage, environmental, flood, landscape and vegetation overlays.

Having the YSP as either an incorporated document or a reference document would have very different statutory outcomes as they have different legal status within the Victorian planning system. Being an incorporated document would mean any changes to the YSP would have to occur through further planning scheme amendments. This would seem a burdensome and inflexible approach if in the future changes were needed to the YSP. This leaves the option for the YSP to

become a reference document and therefore acceptance that it would have a more limited influence in planning decisions.

The form and content of any policy and an amendment will be a matter for Council to consider once it is prepared by DELWP. It is important to gain a better insight from DELWP's of its approach to ensure the YSP is effectively supported through planning schemes. Apart from updating the Yarra River Protection in the Planning Policy Framework, no broader reforms or changes are being proposed that might address wider metropolitan or catchment issues such as water quality or broader development outcomes.

Council strongly supports the permanent and mandatory development controls introduced through Design and Development Overlays, in doing so Council expects that DELWP further advise on the process for reviewing the effectiveness of the current controls and that the process occurs in consultation with local government.

The LUF does start providing a sense of the spatial settings and priorities along the whole of the Yarra River in respect to areas for protection. It is however high level and, while necessarily so as a ten year plan, it has limited detail. Council suggests that there is merit in considering the future development of more localised plans that capture the finer details of the strategic land use, development, infrastructure and environment outcomes. This could occur by individual local governments although a more coordinated approach by reaches could be more effective. In some other situations more detailed local plans are needed to manage sites of significance. For example, a new master plan for Yarra Bend Park would provide a direction as to how the outcomes proposed in the draft YSP can be achieved and provide greater clarity to land managers. Protection of these sites will need to occur not just through planning controls but through understanding and having clear land management directions about each area.

Council supports the existing and new areas for protection as identified in the draft YSP (p68) but would recommend that the Darebin Creek confluence is also recognised as an important riparian habitat link.

The river planning directions for the Suburban and Inner City reaches have a focus on the development along the river corridor. These directions also need to respond to the community visions for each reach which include other matters such as access links and adding to the open space network. In this regard the draft YSP doesn't provide direction as to how these community aspirations will be achieved.

Council supports the plans accompanying each of the Suburban and Inner City reaches. Council recommends specifying additional links within the Inner City reach including:

- A link between Cremorne, south to South Yarra Station.
- Walmer Street bridge and Gipps Street bridge.
- Potential for a new crossing at the northern end of Church Street, Richmond.
- Include additional linear links along the river corridor through the Abbotsford and Alphington area, including the river front of the former Amcor Paper Mill site in Alphington.

Council supports the inclusion of the Abbotsford Structure Plan proposal as a means for planning the access and links along this part of the river corridor. Council seeks further details about the scope, time frames and funding for this proposal.

## **8. Land acquisition and Public Acquisition Overlays**

It is clear from the consultation and the broad performance objectives and actions that river access and extending the open space network are a high priority. Earlier comments have explored this issue generally. The YSP should be providing direction and actions regarding land acquisition priorities and then how and where the Public Acquisition Overlay mechanism (or private covenant) will be used to secure land for the Greater Urban Park Land network.

### **9. Lead Agency**

There is uncertainty about which government agency will lead the implementation of the YSP. It will be important that the agency has the skills and resources to work across government and work with the RPEs to pursue the implementation of the YSP.

The scope of responsibility of the Lead Agency outlined in the draft YSP appears more administrative rather than providing strategic leadership and being the 'driving force' behind the YSP.

### **10. Yarra Collaborative Committee (YCC)**

The YCC was an initiative of Melbourne Water to bring together the RPEs to support its preparation of the draft YSP and provide their expertise and guidance regarding the consultative process and the content of the draft YSP.

Officers consider that the YCC has proved to be an effective forum for discussions and collaboration across the RPEs and is a good example of the new modern governance arrangements that can occur through the YSP.

The collaboration and involvement of the Wurundjeri Woi wurrung in the YCC and in the preparation of the draft YSP has been a significant and important change in approach for RPEs.

Council officers support the YCC having an on-going role supporting the implementation of the final adopted YSP. To do this will require its role, responsibilities and expectations to be defined and accepted by the respective RPEs. The role indicated for the YCC in the draft YSP is widening beyond its current role and Council needs to have an appreciation of the resources needed to support the YCC and also understand the accountabilities of the Council representative on the YCC to the Council.

### **11. Funding**

The draft YSP is not funded which clearly creates uncertainty about how the outcomes will be achieved. In these times it is difficult to make firm commitments for future funding but the need for funding cannot be ignored. As much as RPEs 'business as usual' funding might provide some capacity, it tends to be operational rather than for 'whole of the river' initiatives. It will be important that the priorities and opportunities for collaborative funding is supported and that funding is available to support the YSP.

### **12. Implementation**

The draft YSP should outline how it will be implemented through processes such as the annual and three yearly implementation plans. It needs to be recognised that the draft YSP is high level and it is likely that further work will be needed to resolve the details that are not covered. There are various elements to the implementation, such as the Decision Making Framework and the annual reporting, that will bring about a very different and far more coordinated and purposeful governing of the river corridor. This overall change in approach needs to come through strongly in the draft YSP.

### **13. Conclusion**

Preparation of the draft YSP is a significant step towards meeting the requirements of the Act. Generally the draft sets the right directions. Council looks forward to considering the next version of the draft YSP once it has been refined having regard to the feedback from consultation.