

27 March 2020

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**Re: Draft 10-year Yarra River Strategic Plan**

To the Yarra Collaboration Committee,

Thank you for providing an opportunity to comment on the Draft Yarra River Strategic Plan.

The National Trust of Australia (Victoria) (National Trust) is the state's largest community-based heritage advocacy organisation actively working towards conserving and protecting our heritage for future generations to enjoy, representing 27,000 members across Victoria. As Victoria's premier heritage and conservation organisation, the National Trust has an interest in ensuring that a wide range of natural, cultural, social and Indigenous heritage values are protected and respected, contributing to strong, vibrant and prosperous communities.

The National Trust maintains a Heritage Register of Significant Places, including buildings, landscapes, gardens, trees, and public art. We have several classified places within the Yarra River Strategic Plan area, most notably the Upper Yarra River and Environs Significant Landscape (File no: L10120).

We also own and/or manage five properties within or close to the strategic plan area: Waller House in Ivanhoe, the Old Police Residence in Heidelberg, La Trobe's Cottage in Kings Domain, Como House in South Yarra, and Gulf Station in Yarra Glen.

We commend the committee and other stakeholders for their commitment to developing a holistic framework for delivering on the goals of the 50-year Community Vision for the Birrarung. While we are generally supportive of the Draft Yarra River Strategic Plan (YSP), this submission provides some comments for consideration as the document is finalised. We welcome further discussion and consultation regarding our points outlined below.

***General comments***

The National Trust is in strong support of whole-of-river directions that include implementation of permanent planning controls, review of heritage protections, identification of biodiversity values, and guidelines to support appropriate landscape design along the river corridor.

As a high-level document, the YSP sets out a clear community vision that includes a range of integrated values, which can be referred back to when making future decisions for the river. However, there are some gaps in identifying how this vision will be achieved. While Part 1 contains performance objectives which are translated into actions with delivery timeframes, it is not clear how these actions will be measured.

The YSP should be a beacon for the management, regeneration and protection of urban waterways. The plan should be very ambitious as a call to arms to protect the Birrarung as a natural resource during an unprecedented acceleration in population growth. We encourage the YSP committee to be bold and declare that all projects within the corridor should result in a net gain for the river, as mitigation is not enough to protect the Birrarung from the effects of a rapidly increasing population and climate change.

### ***Major Transport Projects***

It is deeply disappointing that Major Transport projects are exempt from the guidelines set out in the YSP (Part 1, p 43). Such projects have the capacity to have significant negative impacts on the environmental and cultural heritage of the river corridor. And while the Environmental Effects Statement process for major transport projects provides an opportunity to examine these impacts and recommend Environmental Performance Requirements to manage them, the EES process is undertaken at a point when projects are essentially a *fait accompli*. Paradoxically, this means that adverse impacts on the environment are not well understood until after a decision to go ahead with the project has been made.

Recent examples of this include the North East Link, which will have a hugely detrimental impact on the Yarra River corridor. Similarly, the West Gate Tunnel project was pursued despite demonstrated adverse impacts on the Maribyrnong River and other waterways. If the Government's intention is to meaningfully commit to realising the Community's 50-year vision, this exemption should be removed.

### ***Part 1: Working together to deliver the community vision***

Our feedback on Part 1 primarily relates to **Performance objective 2: A culturally diverse river corridor** (p 52). We strongly support the objective of "acknowledging, protecting and commemorating the rich heritage of the Birrarung and its stories".

We note that the cultural heritage discussed in the context of this performance objective primarily relates to Aboriginal cultural heritage. While we are supportive of a strong emphasis on Aboriginal cultural heritage values, we recommend broadening the concept of heritage in this section to include both Aboriginal and non-Aboriginal heritage values.

We also recommend acknowledging that the heritage values of the Birrarung are present at a "tangible" level, embodied in physical places and fabric, and also through "intangible" expressions of cultural practice, both Aboriginal and non-Aboriginal, and historic and contemporary (e.g. gathering; fishing; swimming; walking). Cultural diversity in the values of the river corridor can also be seen in use of the river by migrant communities, such as post-war European migrants, and Chinese and Vietnamese residents.

We commend the YSP's intention to support Traditional Owners to record the river's cultural values, and the delivery of interpretive and educational programs at key sites along the river.

While we support Action 1 (Support Traditional Owners to record the river's cultural values on Yarra River Land), there is a lack of specificity in what this support entails. If the YSP is committing to funding Wurundjeri-led Cultural Heritage Management Plans for the river, this should be clearly stated. If this is not the case, the YSP should still state to what extent it intends to support Wurundjeri to record these values, and what this support will look like.

This section of the YSP notes a key issue in delivery of this objective, which is the lack of holistic heritage assessments for the Birrarung, and inconsistency in council studies. The performance objective identifies the need for consistent documentation of the heritage values of the river. However, no action is proposed to resolve this issue. Action 1 supports the recording of Traditional Owner cultural values, but there is no commitment to recording non-Aboriginal heritage values. We encourage the delivery of interpretive and educational programs across the five identified sites with shared cultural values; however, consistent, holistic heritage studies for the river should be prioritised before these actions are progressed.

We understand that a Birrarung River heritage scoping study was undertaken by Context and a thematic framework prepared, as discussed at the heritage practitioner's workshop in August 2018. We recommend that the YSP includes an action to support councils to undertake updated heritage studies using Context's thematic framework, as well as an overarching heritage study based on this work. The YSP advocates for holistic treatment of the Birrarung as a single corridor, and this should also extend to heritage.

As well as committing to documenting and interpreting cultural heritage values, we also encourage a commitment to maintaining and increasing accessibility of the river corridor to facilitate ongoing cultural practices, as well as acknowledging the importance of the environmental health of the river to safely maintain practices such as swimming and fishing. Opportunities to reinstate historic practices through priority projects should also be considered, such as the proposed Yarra Pool at Enterprize Park (<http://yarrapools.com/>).

Lastly, we would encourage the committee to include an action in Part 1 to give greater agency and support to "Friends of" associations, to work collaboratively with Traditional Owners and other stakeholders to provide greater stewardship for the river environment.

## ***Part 2: Land Use Framework***

### ***General comments and recommendations***

We strongly support the use of Design and Development Overlays (DDOs) and other planning controls which will implement permanent height limits and setbacks along the entire river corridor. It is essential that such controls are mandatory, rather than discretionary, to ensure consistent decision-making across the river corridor. There are many references to the development of additional planning controls across the whole of the

document, yet this work is absent from the actions. Mapping setback lines should be included as an action with a delivery timeframe.

There are also numerous references to providing or updating heritage protection across the corridor, as well supporting heritage interpretation in future planning and design. Again, we advocate for commitment to developing holistic heritage studies so that these goals can be achieved, and we look forward to providing more comment on the details of this during the panel phase.

We suggest that the Land Use Framework includes an action to providing binding design requirements for new developments that will result in a net gain for the river. This should include guidelines for revegetation and design within the setback spaces, and mitigation techniques for stormwater inflows, such as raingardens and porous pavements.

### ***Further comments on the four reaches:***

#### ***Upper Rural***

The YSP committee may like to consider including the Peninsula Tunnels as a significant place in the Upper Rural reach. Big and Little Peninsula Tunnels are identified in the Victorian Heritage Inventory (File no: H8022-0044) as a significant heritage site, and included in the Yarra Ranges Shire Heritage Overlay (File no: HO47).

We note that National Trust property Gulf Station is located in close proximity to the Birrarung in the Upper Rural Reach, providing an opportunity to interpret the history of land uses in the area in relation to the river, such as farming. The National Trust also recently secured funding to work with the Wurundjeri Tribe Council to document the Aboriginal cultural heritage values of the place, both pre- and post-colonisation, including possible connections to Coranderrk Station.

#### ***Lower Rural***

The Tarrawarra-Wering billabong systems are identified as having high environmental, cultural and landscape value, and several options for future projects are laid out. We would be interested to know how if the proposed Melba Highway extension upstream of the billabongs is considered exempt from the YSP under the Major Transport Act, and how this project might negate attempts to protect these important sites.

#### ***Suburban***

The National Trust is generally supportive of exploring adaptive reuse of under-utilised significant buildings and sites, such as Pontville Homestead, Pettys Orchard, and Laughing Waters precinct. We would suggest the following small change on page 104 to reference heritage values: "Investigate options for sensitive reuse to help fund restoration projects in line with the future directions plan, ***the heritage values of these places***, and community expectations."

## ***Inner City***

We support the YSP's focus on environmental and heritage-focused future projects and alignment in the Inner City reach, including the preparation of the Abbotsford Precinct Structure Plan and upgrades, restoration of Gardiners Creek and heritage studies of the confluence, developing a coordinated design response and reintroductions of a riparian zone, and interpretation of additional heritage sites no longer visible in the city, such as Birrarung Falls and Williams Creek.

Opportunities for future projects identified in the YSP include the activation of Herring Island as a tourist attraction and providing a greater sense of connection from Herring Island to Como House, a National Trust property. While we are open to exploring the link between these sites and interpreting historic and contemporary connections between Como and the Yarra River, we are cautious about increased access to Herring Island. There is an underlying assumption in this section of the plan that improving access will somehow benefit this biodiversity hotspot, and this assumption needs to be questioned. Any potential activation of the island needs to centre the biodiversity values and be appropriately funded and monitored to ensure future projects don't have negative consequences on those values.

## ***Conclusion***

The National Trust strongly supports a holistic vision for management of the Birrarung, and we commend the committee for undertaking this work. We welcome future opportunities to provide comment and feedback on the various actions outlined in the strategic plan. Should you have any questions regarding the above, please contact Eloise Dowd, Environmental Heritage Advocate, on 9656 9823 or at [eloise.dowd@nattrust.com.au](mailto:eloise.dowd@nattrust.com.au).

Kind Regards,



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