



PORT PHILLIP CONSERVATION COUNCIL INC.

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The Manager,
Environmental Planning
Port Phillip Region
Department of Environment and Primary Industries
Enviroplan.portphillip@dse.vic.gov.au

Dear Manager,

Re: Parkdale Lifesaving Clubhouse café lease expansion

Port Phillip Conservation Council Inc. (PPCC) is a federation of conservation groups around Port Phillip Bay, whose focus since 1970 has been to work for better conservation of Port Phillip and its unique waters, beaches and foreshores.

PPCC Inc. has formulated a range of policies advocating preservation of the unique coastline of Port Phillip, the most relevant in this instance being [PPCC Inc. Policy Statement No. 7 'Commercial Operations on Foreshore Reserves'](#). Accordingly PPCC is very concerned by the recent decision by the City of Kingston (CoK) Council to allow the commercial operation (café) in the Former Parkdale LSC to extend its operations into the adjacent vacant small hall formerly occupied by the Coastguard.

Cafes and restaurants are non coast dependent businesses which should not be located on our coastal Crown land. Such commercial operations invariably demand supporting infrastructure such as signage, lighting and car parking facilities which all contribute to a degradation of our foreshore assets, and are unsightly intrusions into our coastal reserves.

The expanded café operations would also place additional parking pressure on the area, and thence likely demands for further foreshore car parking. Such commercial operations also compete unfairly with other nearby businesses which are not located on the foreshore. Councils should not provide an unfair advantage to certain businesses at the expense of our limited and fragile coastal areas and net public benefit.

The Victorian Coastal Strategy (2008) states that the limited land resources on our coast need to be used sparingly and for net community and public benefit¹ Criteria include:

- Use and development should have a demonstrated need to be sited on the coast and requires a coastal location to function.
- Fulfils an identifiable need or demand that cannot be met elsewhere
- Enhances public access to the coast and will not result in a reduction of open space.

The café lease proposal did not and does not meet these criteria and should never have been allowed. Thus, rather than extend and entrench commercial operations at the site, as the present proposal would, the existing lease should not be renewed. At the very least any new occupant of the vacant area should demonstrate a need for a foreshore location.

We understand that the decision to extend the café lease occurred despite the Mentone Parkdale Village Committee requesting that the room should not be used for a commercial venture, and an Expression of Interest from the café proprietor originally being refused.

¹ VCS Part 4 Criteria for Use and Development on coastal Crown Land Page 56

Subsequently, and despite 18 months of planning between Council and the [Local Indigenous Network](#) (LIN), and two officer reports recommending approval of a "Gathering Place" for aboriginal children and elders, Council determined that it is more appropriate that the café occupy that space. Further, the decision was made without any community consultation beyond a "discussion" at the Council-appointed Mentone Parkdale Village Committee.

The Gathering Place proposal was part of the Closing the Gap program designed to improve indigenous Health Outcomes to improve the length and quality of life for Aboriginal Australians. It had the support of Parkdale Secondary College, which hosts a Kingston Koori Mob of more than 40 Aboriginal children attending secondary schools in Kingston. Parkdale SC proposed to auspice the Gathering Place, to undertake the lease, supervise usage and to pay for any fitting out necessary.

The Gathering Place proposal demonstrates the purposes of the Victorian Coastal Strategy ([Clause 1.5.1](#)) and of the Victorian [Aboriginal Heritage Act 2006](#) by recognizing Aboriginal people as the primary guardians, keepers and knowledge holders of Aboriginal cultural heritage. The proposal is also consistent with the Strategy's Clause 4 criteria in that it:

- fulfils an identifiable need or demand that cannot be met elsewhere
- demonstrates considerable net community and public benefit and ensures equity in community access to new and existing use and development, and
- facilitates multi-use of sites and existing infrastructure and the rationalisation of existing buildings and car parks without resulting in over-use

The foreshore location is adjacent to the Boon Wurrung Trail and close to one of the few middens to survive the grading of the Mentone-Parkdale cliffs last century.

The [City of Kingston](#) has ignored the clear intent of the VCS, first in its willingness to extend the lease of the existing café, and secondly in determining that the café was a more appropriate tenant than the local Aboriginal community.

We ask that DSE intervenes to refuse Council's application to approve the lease to the café and that Council should be directed to reconsider its decision so that residents, visitors and the local indigenous community can enjoy a more equitable use of the foreshore reserves in the City of Kingston.

Yours sincerely



Len Warfe
President