

Great Ocean Road Region Standing Advisory Committee

Referral of Bells Beach Elevated Walkway
Bells Beach Surfing Recreation Reserve
Wadawurrung Country

*Surf Coast Shire Council proudly acknowledges the Wadawurrung People
as the Traditional Owners of the Bells Beach Surfing Recreation Reserve.*

Written submission by the Committee of Management, Surf Coast Shire
Council

September 2020



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About the Council representatives

Rowan Mackenzie – has worked at Council for 12 years and is the Manager, Environment and Community Safety department. Rowan has qualifications in engineering and natural resource management.

Kate Smallwood – has worked at Council for 9 years and is the Environment Coordinator. Kate has graduate qualifications in environmental law.

Gabrielle O'Shea – has worked at Council for 11 years as a Biodiversity Officer. Gabrielle has qualifications in environmental science, farm forestry and agricultural economics.

A. The reserve

The Bells Beach Surfing Recreation Reserve is in Wadawurrung Country, and the Wadawurrung Traditional Owners Aboriginal Corporation is the Registered Aboriginal Party. As a long term Wadawurrung gathering place, Kuling wada-gnal (let us walk together), Traditional Owners welcome the continued gathering of people at Bells and sharing of this special place. Council has been privileged to care for the area in partnership with the community for more than 50 years since our appointment as committee of management of the Crown land in 1971, and as owner of an adjoining 16.5 ha freehold parcel in the 1960s. The Crown land portion of the reserve is reserved for protection of the coastline and public purposes. (See Appendix 1 for a detailed plan of land management boundaries).

Following clearing of an improved access track to Bells in 1960, the condition of the main use areas experienced significant decline (Figure 1). Council has successfully improved management arrangements and infrastructure since that time and worked with community groups restoring the condition of the reserve (Figure 2). Ninety-two% of reserve users surveyed in 2018 rated their experience of the reserve as 'Very Good' or 'Excellent'. There has been strong community support and involvement in these works. For example, the first conservation surfing contest was held in 1971, Surfers Appreciating the Natural Environment formed in 1988, Rip Curl staff have staged their annual Planet Days in the reserve for the past 20 years and Surfrider Foundation (Surf Coast Branch) has held clean-up days.

Many of the infrastructure improvements have been partially funded by the Department of Environment, Land, Water and Planning and its predecessors through various coastal access, risk and conservation grants. These grants have assisted with constructing the three sets of raised timber beach access stairs which replaced ground level dirt, gravel and timber-edged tracks and steps. Council spends in excess of \$200,000 every year on the reserve maintaining important cultural heritage, surfing and natural values and the experience of reserve users.

Bells is an extremely valued and respected reserve for Council and the Surf Coast community. Council has worked collaboratively with the community on the restoration of the reserve, and continues to work to protect its important Wadawurrung heritage, surfing culture and conservation values while meeting the needs of diverse user groups.

Figure 1 Aerial of main visitor areas at Bells Beach from 1974

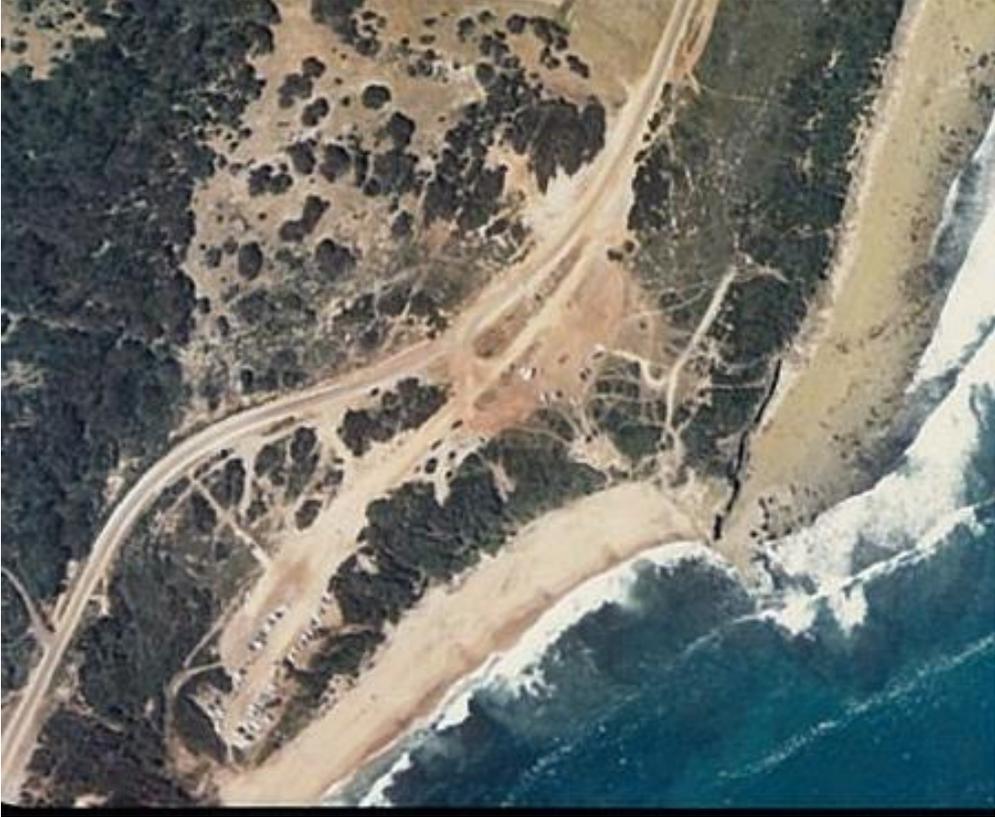


Figure 2 Aerial of the same area from January 2020 showing significant improvements in the condition of the reserve



B. The Bells Beach Surfing Recreation Reserve Coastal Management Plan 2015-25 and the Bells Beach Surfing Recreation Reserve Coastal and Marine Management Plan 2015-25 (updated 2019)

In 2014, Council established a community task force led by independent chair John Thwaites, to develop a new vision for management of the reserve and assist with preparation of a new coastal management plan for Bells. Over an 18 month period there was extensive community consultation including workshops, submission hearings and numerous opportunities for feedback (see Appendix 2 Bells Beach Visioning and Community Engagement).

While the former Coastal Management Act 1995 limited coastal management plans to a life of 3 years, Council wanted to commit to implementing the new vision and strategic management directions for a minimum period of 10 years. In discussions with DELWP staff, it was determined that Council could make this commitment and undertake minor update reviews during the 10 year time frame to meet legislative requirements. The Bells Beach Surfing Recreation Reserve Coastal Management Plan 2015-25 (CMP) received ministerial approval in late 2015.

The vision for Bells in the CMP is 'to respect and protect the natural environment, indigenous heritage and surfing culture of Bells Beach'. The CMP has two guiding principles – respect and protect – and three core values – natural environment, indigenous heritage and surfing culture.

Key management actions completed since the adoption of the CMP include:

- Appointment of the newly structured Bells Beach Committee to provide advice to Council on management
- Restricting and managing events in accordance with the new Events Policy
- Completing an independent audit of the staging of the Rip Curl Pro (conducted by Otium Planning Group in 2016) to facilitate improved staging of the event and reduced impacts on reserve users
- Conversion of the former helicopter landing area to a new landscaped lookout
- Collaboration with the Wadawurrung on various matters such as the future of the heritage listed toilet block mural, advice on works implementation, sharing cultural values of the reserve through experiences such as smoking ceremonies, a cultural heritage tour, funding of an archaeological investigation of the midden (in progress) and a traditional owner video "Bells Beach - Wadawurrung Country"

(<https://www.surfcoast.vic.gov.au/Environment/Natural-environment/Coastal-land-and-beaches/About-Bells>).

- Improvements to the Winki car park layout (keeping within the same footprint), widening of the pedestrian path adjoining the Winki car park, replacement of the concrete path to the Button lookout.
- Ongoing conservation works such as weeding, planting and erosion repair.
- Reduced commercial visitor numbers from stopping access by large commercial tourist buses and capping the number of licences granted to small tour operators at 8 (there are currently 4 licences issued).

During 2018 and 2019, Council facilitated a minor update of the plan under the Marine and Coastal Act 2018, leading to Council adopting the Bells Beach Surfing Recreation Reserve Coastal and Marine Management Plan 2015-25 (updated 2019) (CMMP) in November 2019. The vision, guiding principles and core values were all retained in the updated CMMP, with the generic reference to 'indigenous heritage' replaced with 'Wadawurrung heritage' at the request of the Wadawurrung.

C. The elevated walkway proposal

The 2019 update of the Bells Beach Surfing Recreation Reserve Coastal and Marine Management Plan 2015-2025 (CMMP) was adopted at Council's November 2019 meeting,

Reflecting Council's resolution when adopting the plan, the CMMP includes a proposal to consider replacing the concrete path leading to the Winki lookout with a raised timber pathway (Figures 3 & 4) – subject to the findings of additional consultation centred on constructing the temporary pathway for the 2020 Rip Curl Pro as close as practicable to the dimensions of the concept design included in the plan. The findings of the additional consultation would then be evaluated in consultation with the Bells Beach Committee and a report recommending the proposed long term solution for the pathway presented to Council for a final decision.

Figure 3 Overview of the paths in the Winkipop area



Figure 4 Close up of the site of the proposed elevated timber pathway, replacing concrete



Summary of key aspects of the elevated walkway proposal:

Existing infrastructure proposed for replacement (Figure 5)

- Ground level concrete pathway constructed in the 1980s.
- Approximate width (some variations) 1.5m
- Pathway edging – Gherang gravel
- Fencing – treated pine post and ringlock wire, approximate post height of 1.1m

Figure 5 Existing concrete pathway and fencing



Proposed replacement pathway (Figures 6 to 9)

- Materials – timber and potential metal handrail and balustrade to minimise visibility
- Width – decking width of 2.4m, distance between angled handrails/balustrade 3m
- Height – with the naturally sloping ground surface, it is proposed that the replacement timber pathway would:
 - start at ground level near the junction with the concrete path to the Button lookout,
 - have a timber ramp to a deck height of 0.55m above the ground surface,
 - then have a level length of pathway which, because of the fall in ground level to the north, ends with a maximum deck height of 1.53m above ground level,
 - then timber stairs until it connects with the existing raised timber stairs leading to the foreshore at the Winki surf breaks (Figure 10)

- Balustrade height – 1m above the deck height
- Length - including the timber ramp, pathway and steps, the total length of concrete that would be replaced is 59.3 m in length (Figure 9)
- Fencing – not required where there is handrail and balustrade – existing fencing to be removed
- Supports – metal screw piles

Note - with a decking base width of 2.4m, the proposal's primary function is a pathway, with viewing opportunities.

Figure 6 Concept design, artist impression



NO.	DATE	DESCRIPTION	BY	CHECKED
1	02/06/2023	Final Design		
2	02/06/2023	Final Design		
3	02/06/2023	Final Design		
4	02/06/2023	Final Design		
5	02/06/2023	Final Design		

GENERAL NOTE:
These renders are illustrative concept images only for the purpose of understanding the design. Please refer to the full documentation package for a description of all design elements.

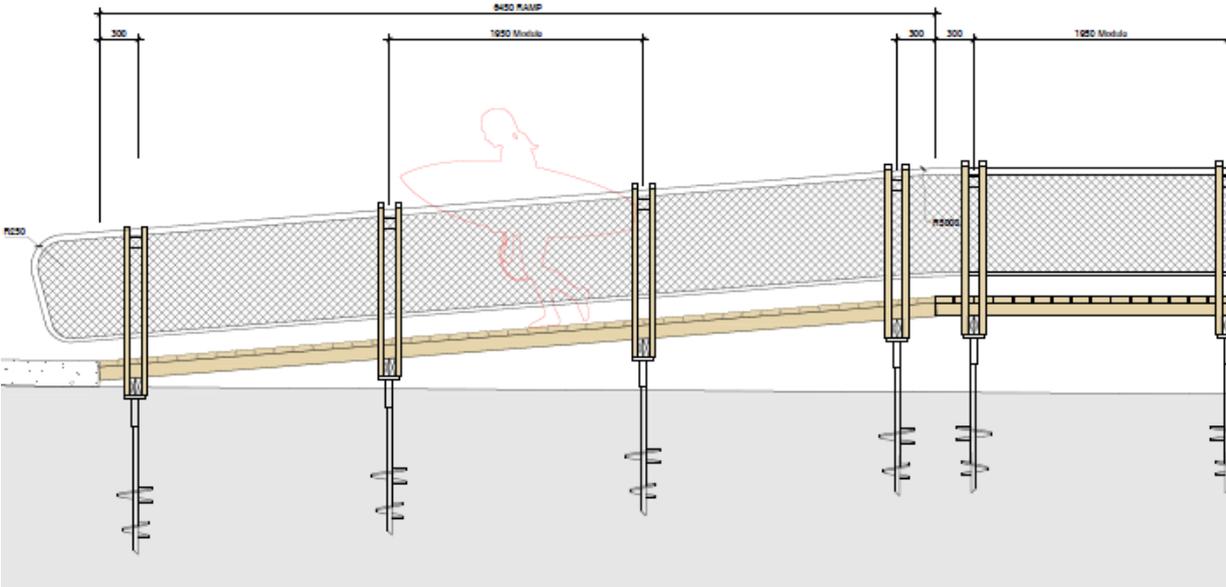


Project Design
SITE | OFFICE
6 The Drive Pty Ltd 11 Leitch Drive Belmont East VIC 3207 Australia Ph 051 4254 566 Fax 051 4254 567

Client	Surf Coast Shire
Drawn By	02/06/2023
Checked By	02/06/2023

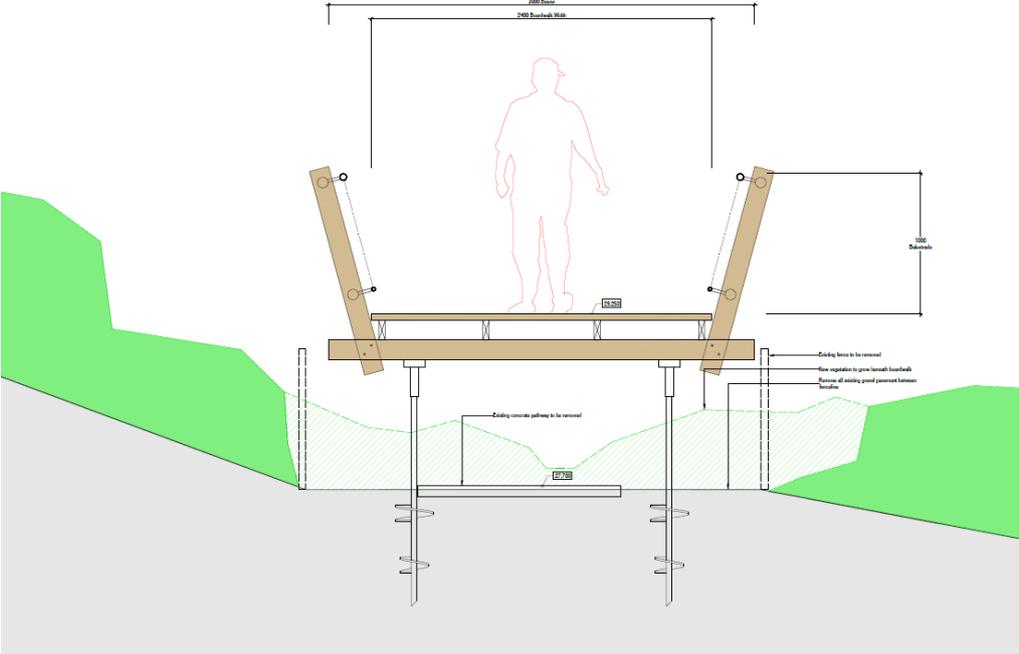
INFORMATION ONLY - NOT FOR CONSTRUCTION
Drawing No. Landscape Rendered: 02
Drawing Scale: 1:100
WINKIPOP ELEVATED BOARDWALK LA003

Figure 7 Concept design, side view with dimensions



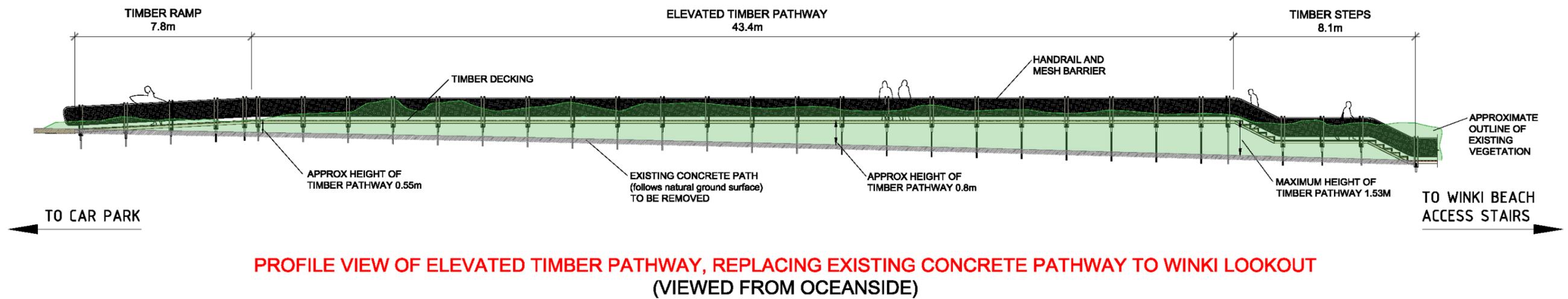
(See PDF of Concept Design to enlarge view – provided separately to GORRSAC)

Figure 8 Concept design cross section



(See PDF of Concept Design to enlarge view – provided separately to GORRSAC)

Figure 9 Profile view of proposed replacement elevated pathway, including adjoining vegetation height on the ocean side



Note – Zoom in to see measurements or see PDF file of this profile view to enlarge - provided separately to GORRSAC.

Dimensions

- Length: 59.3 m (including access ramp & timber steps)
- Pathway Height: Graduated height from 0.55 m at ramp, 0.8 m near mid-point, to maximum height of 1.53 m at Winki steps
- Balustrade height: 1 m above deck height
- Deck Width: 2.4 m
- Handrail distance: 3m between angled handrails/balustrade

Key Design & Function Considerations

- Kept to a low minimum height to reduce visibility from other parts of the reserve and the water, but of sufficient height to avoid the disruption of building a temporary structure each year for the Rip Curl Pro
- Graduated height to minimise visibility from water
- Includes a ramp at the southern end to improve access for more reserve users
- Consistent in form with other raised timber pathways in the reserve, including adjoining pathways and lookouts
- Utilises materials used elsewhere in the reserve and which are sympathetic to the rustic coastal environment, while minimising visibility
- Use of natural materials – timber – consistent with user preferences and other reserve infrastructure
- Use of metal hand rail and open wire balustrade to minimise visibility from water – change from steel mesh originally proposed
- Enables adjoining fencing and concrete pathway to be removed and landscaping undertaken beneath to reduce habitat fragmentation

Figure 10 Existing raised steps between the proposed replacement section of pathway and the Winkipop surf breaks



D. Basis for considering a change from ground level concrete to raised timber pathway

Brief introduction

The concrete pathways leading from the Winkipop car park to the Button and Winki lookouts were constructed around 30 years ago. With their narrow width requiring people passing others carrying a surf board to step off the track, gravel edging often wider than necessary, cracks, deteriorating parallel fencing and hazards such as the gradient and loose pebbles washing onto the track after rain, the paths have been of management concern for some time.

Previously, proposals to realign the tracks and improve their appearance and grade using switchbacks did not receive community support. Any renewal would need to be confined to the existing pathway envelopes. Council initially considered replacing both paths with wider exposed concrete aggregate with landscaped edges. However, the logistics for the staging the Rip Curl Pro have changed recently, with increased use of the Winkipop breaks if conditions in the Bells Bowl are unsuitable. To enable athletes (and coaches) to view the last

part of the Winkipop break as it reaches the shoreline before they enter the water for their heat, for the past two years a temporary elevated pathway has been constructed on top of the concrete pathway to the Winki lookout.

As Committee of Management, Council has to balance considerations such as the needs of the Rip Curl Pro, disruption to regular users relating to the set up and staging of events, safety, appearance of temporary infrastructure which may be in place for more than a month each year, visitor experience, heritage values, improving access and the maintenance of infrastructure. Detailed information on these management considerations is now provided.

Detailed management considerations

Staging arrangements for the annual Rip Curl Pro

The Association of Surfing Professionals Australasia Pty Ltd holds a Crown land licence, approved by the Minister's delegate, to stage the Rip Curl Pro in the Council-managed reserve each year (and a similar licence with Council for the freehold portion of the reserve). Under the terms of the licence, the ASP (who contracts Surfing Victoria to do the staging) has 45 days to set up the site (known as the 'bump in'), run the trials and main event, and pack up the site (known as the 'bump out'). During the licence period, surfers are able to continue using the surf breaks not being used by the competition, including during the final (though parking is more difficult and the distance to walk in greater).

Following the 2016 event audit by Otium Planning Group, which included analysis of the bump in and bump out, many improvements were made to the staging of the event – including safety improvements, changing traffic management during the bump in/bump out and staged handback of parts of the reserve after the event. This resulted in a two day reduction in the event licence period (down from 47 days). Council hopes this event window can be further reduced over time given that disruption from events to everyday surfers was a priority recommendation of the Task Force. Improving the bump in/bump out periods associated with the Rip Curl Pro is a strategic action in the CMP and the CMMP.

In the past two years, there has been increased use of the Winkipop breaks for the Rip Curl Pro if the conditions in the Bells Bowl are not favourable. Relocating the event to Johanna or

Phillip Island, as occurred in the past, presents difficulties to the staging and viability of this international, professional sporting event. The last part of the run into shore of the Winkipop surf breaks is not visible from the concrete path, and to enable surfers and their coaches to see the entire break before they enter the water for their heat, the organisers constructed a temporary elevated pathway above the concrete path in 2018 and 2019 (Figure 11). The temporary pathway stays in place for around four weeks. Issues related to the temporary pathway include:

- Set up takes a full day as does dismantling (impacting the bump in/bump out)
- Keeping the access track open for surfers during set up and dismantling was trialled in 2018 but it is difficult to meet safety requirements while doing this. The event site is considered a work place and must adhere to Work Safe standards.
- The temporary pathway has steps at each end and is not as easy to use by barefoot surfers and other reserve users.
- The event organisers can attempt to set up and take down the temporary pathway when the surf is poor, but as the infrastructure comes directly from the Grand Prix it is not always possible to coordinate.
- The disruptions to reserve users during staging are not consistent with the CMP and CMMP strategic actions to improve the bump in/bump out periods associated with the Rip Curl Pro and to continue to retain access to surf breaks in the reserve during competitive surfing events.
- The scaffolding for the pathway is transported to and from the erection site with a vehicle via the concrete path from the car park. Council officers are concerned that the construction vehicle and scaffold footings may damage upgraded concrete pathways.

Figure 11 Temporary elevated walkway erected for the Rip Curl Pro



Age and safety of concrete pathways from the Winkipop car park to the two lookouts

Built in the 80s, the original concrete pathways to the Winki and Button lookouts were deteriorating. Issues included:

- pathways were too narrow at approximately 1.5m to cater for people passing carrying surfboards
- pebbles from adjoining gravel edging washed onto the path, creating slipping hazards
- cracks had appeared in the pathways
- the adjoining fencing was deteriorating.

The above issues led to discussions on the benefits of replacing or renewing these pathways. Consistent with Council's resolution of 26 November 2019 adopting the CMMP, the pathway to the Button lookout was recently replaced because of these issues. A more detailed description of the works undertaken is included below, in the 'All Abilities Access' section. The concrete pathway to the Winkipop lookout was left as is while the elevated pathway proposal is being considered.

Cultural heritage

The Wadawurrung Traditional Owners Aboriginal Corporation has been involved in preparation of the updated coastal and marine management plan for Bells (CMMP), including the raised timber pathway. Recognising the special connection Wadawurrung Traditional Owners have to Bells and acknowledging their knowledge, rights and aspirations as Traditional Owners, the CMMP includes a foreword from Wadawurrung Traditional Owners, recognising their status, a Wadawurrung acknowledgment in language, a translation of the CMP vision in language and various management actions requested or suggested by Traditional Owners as part of their review of the plan, including undertaking an archaeological investigation of the midden site at Bells. The CMMP retains the original three core values of the CMP, including Wadawurrung heritage. Wadawurrung connections to Bells were also promoted in consultation to develop the updated CMMP, including a cultural heritage tour and a video “Bells Beach – Wadawurrung Country”, both featuring Traditional Owner Corrina Eccles.

More broadly speaking, there are close cultural links with surfing at Bells, with the National Indigenous Surfing Titles staged in the reserve annually, and the Wadawurrung hosting an opening ceremony for the Rip Curl Pro each year.

Detailed aboriginal cultural heritage investigations of the main visitor use areas at Bells were undertaken as part of the preparation of Cultural Heritage Management Plan 10062. The survey extent included the concrete pathway envelopes. No aboriginal places were found in the vicinity.

Significant ground disturbance (as defined under the Aboriginal Heritage Regulations 2018) has occurred in places where machinery has been used to excavate or dig to construct infrastructure, including the concrete paths. The proposed works would be restricted to the significantly disturbed existing pathway envelope (not an area of cultural heritage sensitivity under the regulations) and there are no known aboriginal heritage sites close to the pathways. Standard Aboriginal cultural heritage induction for works staff would occur prior to any works commencing.

Other heritage values

Surfing was the driver behind increased access to Bells in 1960, and competitive surfing started there the following year. In recognition of these values, the reserve is a listed heritage place on the Victorian Heritage Register (VHR H2032). Permits are required from Heritage Victoria for works beyond maintenance. Council received advice from Heritage Victoria that a permit will be needed for a change from a concrete pathway to raised timber, but a final design plan is required to make an application. As past beach access stairs and lookouts such as the new landscaped lookout on the former helicopter landing area have received Heritage Victoria approval, and the proposal will not result in harm to social and historical values listed on the Register, it is anticipated that a permit is likely to receive favourable consideration.

Bells is also part of The Great Ocean Road and Scenic Environs listed place (Place ID 105875) on the Australian Heritage Database. Specifically relating to Bells, the listing mentions important fossil records, scenic views and its importance as the site of the longest continuously staged surfing competition and home to one of the most prestigious trophies in surfing. As designed, the proposed pathway does not adversely impact the listed values.

All ability access

Access for all abilities at Bells faces constraints from gradients, the protection of environmental and cultural values and surfaces of varying materials and qualities. After consultation with Council's All Abilities Committee, the focus of Council's approach became:

- Making the top car park the priority destination for all ability visitors (because of the slope in the lower car park)
- Shifting parking for people with disabilities to the coastal side of the car park and installing a layback in the kerb beside the car park
- Shifting the kerb out further into the car park and widening the gravel path running through the top car park, enabling people with mobility restrictions to fully access views from the new helicopter landing area viewing point and along the length of the pathway - including views over the Bells Bowl.
- Removing the angled landing at the top of the concrete paths leading to the Button and Winki lookouts.
- Improving the concrete path to the Button lookout as far as possible within site constraints. The steeper grade of this path makes it too difficult for most visitors with

restricted mobility. However, renewal with exposed aggregate with slight grade improvements and increased width and no steps, enables access by a greater number of people.

The above works were completed progressively over the past two years, finishing with the replacement of the concrete pathway to the Button lookout in July 2020. As well as the replacement of the old concrete path with a 2m wide exposed aggregate pathway, the sides were mulched and landscaped to remove the loose pebble slip issue, and stormwater management was improved by the installation of two new stormwater pits in the car park at the head of the pathway and upgraded in-path drainage with new pits and pipes within and beneath the pathway. Fencing on the sides of the pathway is required to prevent public access to unsafe cliffs and to protect remnant vegetation, but plain wire fencing has replaced the old ringlock (grided wire) fencing to reduce barriers to fauna movement.

Note - if the proposed raised timber pathway had a ramp at its southern end it would be useable by more people – incorporating this feature means the proposed walkway became longer than originally planned. The northern end joins with the existing raised pathway which has steps, so there are no further benefits from another ramp at this end.

Visitor numbers

In response to concerns raised by some members of the Bells Beach Committee that an elevated walkway would attract visitors and lead to increased litter, advice was sought from Council's Economic Development and Tourism staff. They advised that as:

- the proposed timber pathway does not offer any new views along the coastline in any direction that are not currently provided by the existing concrete path or the Winki and Button lookouts; and
- Council is using a number of management strategies to prevent visitor numbers from rising uncontrollably - stopping large commercial buses, restricting the number of small tourist operator licences, not opening any new car parking areas and closing most of the overflow car parking west of Bells Beach Road;
- the elevated walkway is unlikely to attract more tourists to the reserve.

In regards to litter, the greatest amounts of litter are consistently found by Council staff in and close to the car parks, during their three litter pickups each week. To help reduce litter, Council staff are installing a new Big Belly Bin in the Winkipop car park, but we don't expect this will totally rectify the situation. The quantity of litter collected reduces with distance from the car park, though the blustery coastal winds can carry litter significant distances.

Independent travellers will continue to visit Bells as it is a world renowned surfing destination, as the Australian Heritage Database listing acknowledges. Infrastructure assists with managing visitor access, safety and impacts.

Flora and fauna considerations

By confining the works to the already cleared and disturbed pathway envelope, no new clearing of vegetation is required. In most locations, the width of the pathway envelope is wider than required (up to 5m wide), and if a raised pathway is constructed, Council will revegetate the excess areas. The old concrete pathway will be completely removed.

While light will be limited beneath much of the pathway given its low height and use of timber decking, Council can incorporate indigenous spreading species such as Bower Spinach and Seaberry Saltbush into the landscaping to assist with improving vegetation coverage in low-light areas. The area beneath the pathway will be mulched to limit weed growth and assist replanting. Council had considered a form of mesh decking to increase light underneath, but most users would prefer timber (as per 2018 consultation).

While not a primary driver, the removal of ringlock fencing on both sides of the pathway and raising the pathway above the ground are improvements for native fauna that live or spend a lot of time at ground level and are known to occur in the reserve. These include the Rufous Bristlebird (commonly sighted around the car park), wrens, reptiles such as the Tree Dragon, and the Short-beaked Echidnas, which are active during the daytime and smaller, mostly nocturnal animals, such as Bush Rats, Swamp Rats and Swamp Antechinus. Appendix 3 provides further information on fauna found within the reserve.

Human induced habitat fragmentation is considered a 'key threat' to biodiversity in Australia (Dept of Environment, Water, Heritage and the Arts 2008,

<https://www.environment.gov.au/system/files/resources/e9f0d376-78eb-45cc-9359-797c6b0f72ff/files/chapter5.pdf>). Mitigation measures are a focus of conservation biology efforts to manage fragmentation. Since the extensive habitat fragmentation evident in the aerial from 1974, the cumulative benefits of many small, separate actions such as track rationalisations, brush matting and revegetation have reduced fragmentation and contributed to the high quality habitat now available within the reserve. The change from ground level concrete to raised timber would be another positive step in the ongoing improvement process.

Visibility of people and infrastructure in the reserve from different viewpoints

Maintaining visitor enjoyment while protecting cultural, heritage and conservation values requires a level of infrastructure and servicing, as demonstrated by the erosion and clearing that resulted from uncontrolled use in the 60s and early 70s. Fences, pathways, sealed car parks, and stairs enable people to enjoy the reserve while protecting important cultural, heritage and conservation values.

The proposed raised pathway was designed at the minimum height necessary to enable all reserve users, including athletes and coaches for the Rip Curl Pro, to see the final part of the Winkipop surf break. The proposed elevated pathway sits just over 80cm lower than the height of the temporary structure constructed for the Pro in 2018 and 2019. If the height is any lower, the organisers of the event have advised they will still have to construct a temporary structure above it each year.

Vegetation on the coastal side is of a height that will obscure most of the proposed pathway structure, when viewed from the water. Currently, surfers in the water looking back to the reserve can see the timber Winkipop beach access stairs, along with people standing on the Button lookout, the Winki lookout, alongside the fence bordering the Winki car park and on the former helicopter landing area lookout.

The temporary pathway erected for the 2018 Rip Curl Pro was up for around four weeks, and there was the opportunity for many local, regular users, particularly surfers, to make use of it. Later that year, Council surveyed reserve users about a range of management matters to

inform development of the updated CMMP. Forty-nine% of the 502 respondents had seen the temporary pathway and 40% had used it.

Though the temporary walkway was higher and constructed from shiny prefabricated scaffolding, (see photos provided separately of the temporary pathway on land and from the Winki break), half of the 2018 survey respondents said they would like it or love it if a permanent section of elevated pathway replaced the concrete, while a further 18% said they could live with it (Figure 12). These responses stayed roughly the same even when a weighting was applied to the views of locals and surfers (to avoid accidentally placing too much importance on the views of international or occasional visitors, or users that didn't understand surfing). Council understands GORRSAC has a copy of the full 2018 survey report, but it is available under Project Background at <https://www.surfcoast.vic.gov.au/About-us/Your-Say/Active-Projects-Your-Say/Bells-Beach-Management-Plan-update> .

Figure 12 2018 survey results – Q 12 – elevated walkway

12) How would you feel if a permanent section of elevated pathway about 40m long replaced this concrete path? Path leading to Winki surf breaks.]	Number	% of responses per category
I would love it	94	18.7
I would like it	152	30.3
I would live with it	94	18.7
Not sure	59	11.8
I would loathe it	94	18.7
Nil response	9	1.8
Total	502	100.0

Based on this and other feedback, Council engaged landscape architects, Site Office, to prepare a concept plan for consultation as part of the draft update to the Bells Beach Surfing Recreation Reserve Coastal and Marine Management Plan (CMMP) that was exhibited for public comment in 2019. Respondents could make comment via a written submission or filling in a questionnaire. Alongside the draft document and electronic questionnaire which contained several images, further design plans were also available to view on line, and in hard copy during on site consultation.

During the exhibition period of the CMMP, there was a spike in responses (Figure 13) that appeared related to an altered image of the concept design posted on social media (Figures 14 & 15). The balustrade height in the original Site Office concept is 1m. In the altered image using the Site Office image as a base, people added to the structure were mostly at least double the height of the balustrade.

Figure 13 Receipt of questionnaire responses throughout the exhibition period

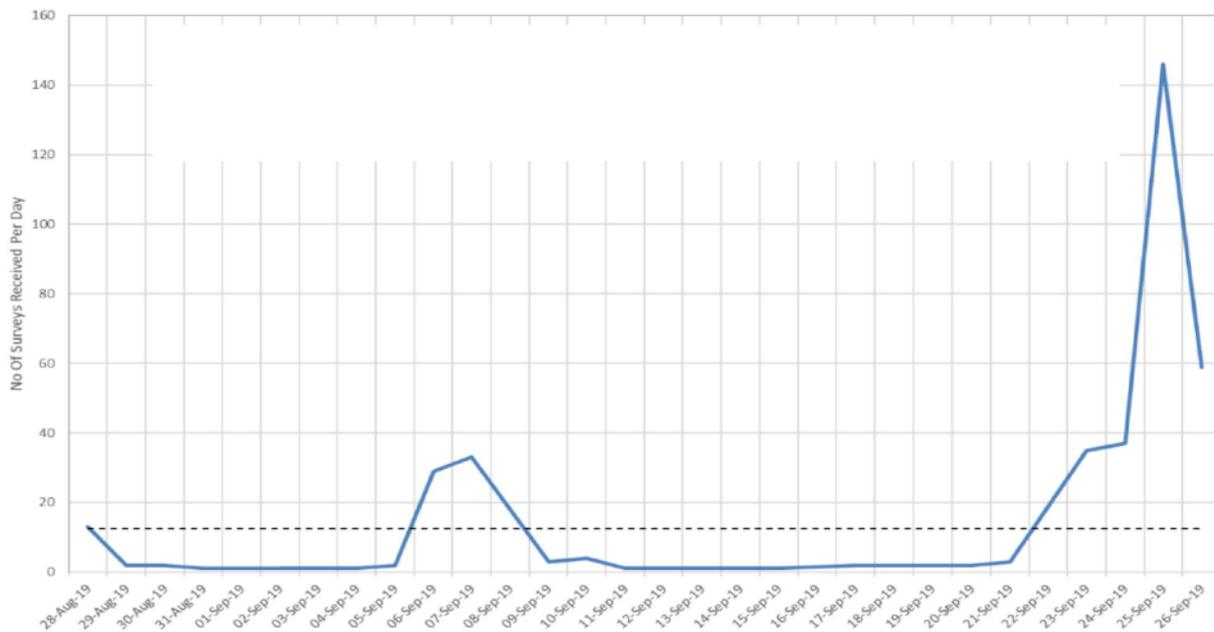


Figure 14 Original artist impression



Figure 14 Shared altered image



Figure 15 Post and image 22 September 2019

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CALL OUT TO ALL WINKI POP SURFERS

This is what you'll be faced with if the World Surf League get their way in the current consultation happening about Bells Beach.

The WSL want a raised walkway above the existing concrete footpath. 1.5 metres high, 60 metres long to assist with running the Easter surf comp if it's held at Winki. The request by the WSL has not been disclosed in the consultation process.

It doesn't comply with the Coastal Management Plan which says 'Minimise infrastructure within the Reserve'

Of the 66 comments received in last year's survey, 36 of the 66 comments were against it. Only a dozen or so were in favour.

It will be highly visible from the water above the vegetation. One of the terrific things about surfing Winki is there are hardly any man made structures visible from the water. This will change that completely. So fill in a survey and let the Surf Coast Shire know if you loathe it, hate it or love the idea of surfing Winki Pop with mass of fans cheering you on?

And let them know about their plans for more hard surfaces in the Bells carpark too.

Fill in a survey by 5pm this Thursday 26th September at <https://www.surfcoast.vic.gov.au/.../Bells-Beach-Management-P...|d13b95b2-5146-4b00-9e3e-a80c73739a64|4f05f368-ecaa-4a93-b749-7ad6c4857c1f|en-AU>

23 18 comments 3 shares

Like Comment Share

At the close of the consultation, the 2019 survey respondent feedback was as follows (Figure 16).

Figure 16 Results of question relating to elevated pathway proposal 2019

How would you feel about a permanent section of elevated pathway being installed to replace this section of concrete pathway?

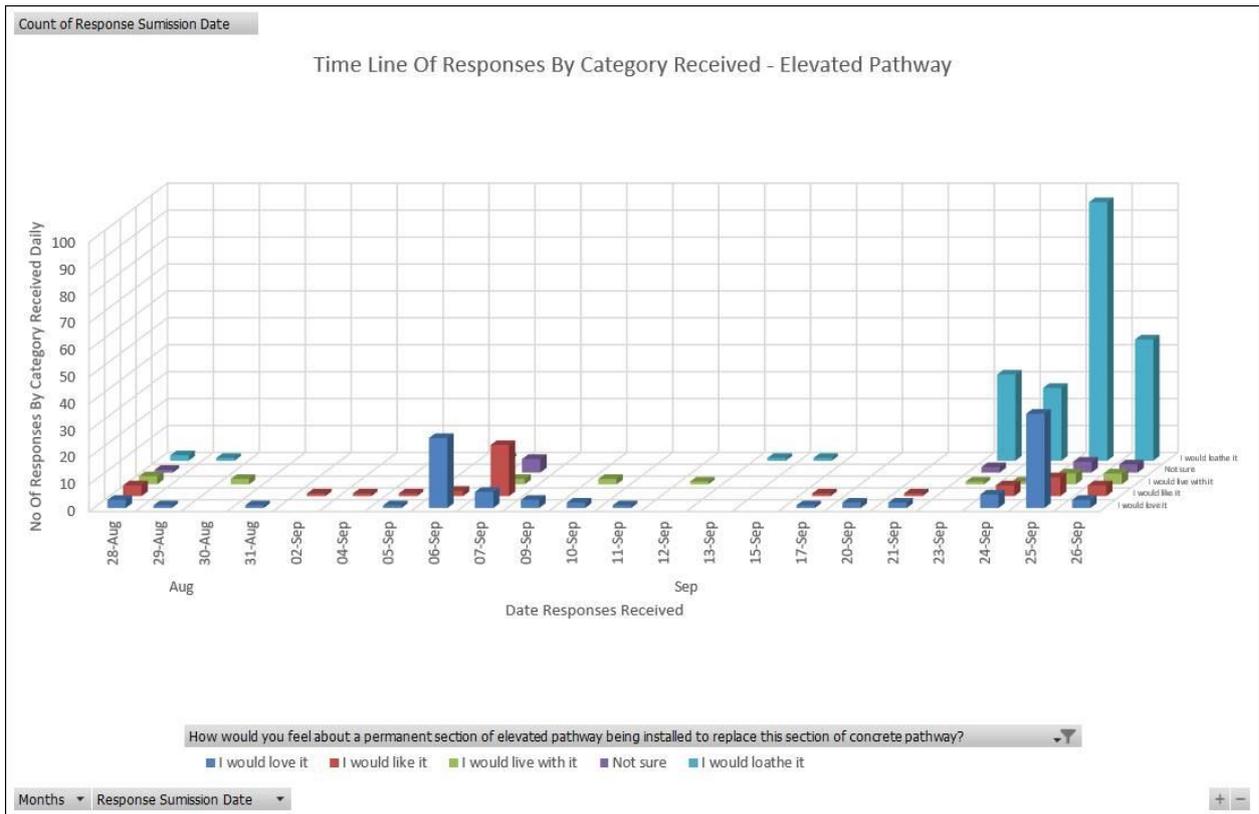
	Number	% of responses per category
I would love it	92	24.3
I would like it	45	11.9
I would live with it	20	5.3
Not sure	15	4.0
I would loathe it	206	54.4
NIL response	1	0.3
TOTAL	379	100.0

As well as the above questionnaire responses, there were 6 written submissions focused on why a raised timber pathway should not replace the concrete (along with several other concerns).

Note – for GORRSAC’s proposed site visit to Bells, Council staff can arrange to have a string line installed on the Winki lookout pathway to demonstrate the proposed height of the deck and handrail based on the design drawings to avoid any confusion as to the height of the proposed walkway.

As Figure 13 demonstrates, there was a marked spike in responses in the last three days of the public exhibition period of the CMMP. The Facebook post featuring the altered image was made on 22 September 2019 and the spike in survey responses commenced the next day. As Figure 17 shows, the majority of the responses in the last three days opposed the elevated walkway. (Both figures are included in the 2019 Engagement Report on the CMMP, available on our website at <https://www.surfcoast.vic.gov.au/About-us/Your-Say/Active-Projects-Your-Say/Bells-Beach-Management-Plan-update>).

Figure 17 Further detail, timeline of responses by category received – Elevated Pathway



Following exhibition of the draft CMMP, Council officers checked the height of vegetation on the ocean side of the pathway and reviewed photos taken offshore when the higher temporary structure was in place. An accurate representation of the proposed elevated walkway and the height of the adjoining vegetation on the coastal side is shown in Figure 9, and provides more detail than the original concept image.

Acknowledging the feedback that reserve users would be concerned if people on the pathway were as visible as depicted in the altered image, Council resolved to build the temporary pathway for the 2020 Rip Curl Pro as close as practicable to the dimensions in the Site Office concept plan, and undertake further consultation on the views of users before making a final decision on the proposal (see copy of Council resolution 26 November 2019 provided to you).

While the temporary structure would be visually dominant with shiny scaffolding, users would be able to check how visible people on the structure were from different angles given the height seemed to be the main concern. Unfortunately, the Rip Curl Pro was postponed and later cancelled due to COVID-19, so this further consultation and evaluation was not undertaken.

State policy and guidelines

The Marine and Coastal Act 2018 established the current strategic, policy and planning directions for Victorian Coastal areas, along with the requirements of new coastal and marine management plans and consents for works in coastal areas. This Act came into place during updating of the coastal and marine management plan for Bells, and several associated documents were finalised after completion of the updated plan (ie the new Marine and Coastal Policy, March 2020 and the Siting and Design Guidelines for structures on Victorian Coast, May 2020). However, Council has liaised regularly with DELWP staff on the requirements of the new strategic directions and consents. The proposed replacement of a section of concrete pathway with a raised timber pathway is consistent with the guiding principles for coastal and marine management in Victoria, and the siting and design fundamentals of the new guidelines have been followed in consulting and preparing the detailed concept designs.

Council is aware that Marine and Coastal Act consent will be required for any change to the pathway and followed the steps required to enable an application to be made for Marine and Coastal Act consent.

E. Issues raised by GORRSAC in meeting schedule advice letter

Issue a) Does the proposed design meet the functional requirements of observation and/or providing a platform for temporary facilities for surfing competitions?

Functional requirements

Deck height is the critical factor for the elevated walkway. Surfing Victoria, who manages site set up of the Rip Curl Pro, has advised that the deck height in the concept design drawings is the minimum height that would enable athletes and their coaches to see the last part of the wave. If it was any lower, they would still need to erect some sort of temporary structure to meet the viewing requirements of participating athletes and their coaches.

The maximum deck height of 1.53m in the concept design was based on a site inspection when the temporary walkway was in place for the 2019 Rip Curl Pro. The inspection was attended by Council staff, Site Office staff and members of the Bells Beach Committee, and

involved repeated changing of positions, heights and measuring of the options in discussion with Committee members. The temporary structure erected for the 2019 Rip Curl Pro was just over 0.8m higher than the height included in the concept design.

The proposed elevated walkway is not required to serve as a platform for any temporary facilities for any surfing competitions - the only functional requirement for surfing competitions is height. Other features included in the concept design drawings were based on other considerations. For example:

- safety (balustrade height),
- the need to keep within the existing pathway envelope to protect remnant vegetation and avoid areas of aboriginal cultural heritage sensitivity (deck width),
- the views of reserve users who told us they felt timber to be a sustainable product to use (materials),
- the need to blend in with the landscape to reduce visibility from different viewpoints (materials eg handrail and balustrade),
- minimising ground disturbance (led to the inclusion of screw piles rather than post supports), and
- the recommendations of a marine structural engineer who advised against use of the current vertical balustrade metal rods seen in other parts of the reserve as they hasten rot in adjoining timber (balustrade design and materials).

During the Rip Curl Pro, judging tents are set up on the nearby Winkipop lookout and a camera to film replays for the judges is mounted on a separate stand just downslope of the pathway. During the Rip Curl Pro, if the Winkipop surf break is being used, athletes and coaches would stand on the elevated pathway ahead of entering the water so they could assess the conditions and waves. If the Rip Curl Pro is using the Bells breaks, the elevated pathway would be open as per other parts of the reserve.

Note - even if there was no permanent or temporary elevated walkway, if the competition was using the Winkipop breaks, public access to the concrete pathways would be restricted to manage athlete access and control the crowd in this narrow area.

The Torquay Boardriders Club is able to stage one event per year on the Winkipop breaks (a single day event) and no infrastructure would be required to be set up on the elevated pathway

to run this event. The other surfing events permitted in the reserve are allocated to Surfing Victoria and as with the Rip Curl Pro, no infrastructure would be required to be set up on the elevated walkway to stage these events.

Issue b) Has the design been assessed to ensure it meets the requirements for unrestricted fauna access under the elevated walkway?

Fauna that live in or pass through the reserve are reasonably well understood based on targeted surveys sponsored by Council and incidental observations (see Appendix 3). There are many fauna species known to occur in the reserve that either live at or spend significant portions of their lives at ground level including reptiles, birds and small mammals.

When originally working on the concept designs, fauna requirements were specifically raised in discussions with the Bells Beach Committee, including during the site inspection. A number of alternative design features were raised which would potentially improve fauna outcomes. For example, if it was higher it would be less of a barrier and it would enable more light to penetrate further beneath from each side (particularly during early mornings and late afternoons). This additional light would enable improved landscaping outcomes, as would the use of mesh decking such as a carbon reinforced plastic non-slip mesh which would let in more moisture as well as light.

It was also suggested that a higher deck would facilitate improved maintenance by making it easier to weed underneath and pick up litter. However, the final concept designs are a balance, designed to protect a spectrum of Wadawurrung, heritage and environmental values and impact on viewscales. Reducing habitat fragmentation by raising the path above ground level to the design in the concept plans, removing the fencing and revegetating beside and under the pathway, will still be beneficial to ground dwelling fauna known to occur in the reserve (even if it is not as potentially beneficial as a pathway of a higher elevation).

While no in depth assessment has been undertaken into how the behaviours of ground dwelling fauna at Bells will change with the proposal, historical photos document the reduction in habitat fragmentation in the reserve over time leading to the high quality fauna habitat available today. The improved habitat quality is the result of the cumulative benefits of hundreds of separate remedial conservation actions, such as track rationalisations and brush

matting of bare areas and revegetation works. The proposed change to an elevated pathway would be a continuation of this ongoing improvement process.

In 2008, the Australian Research Centre for Urban Ecology, reviewed mitigation measures used to deal with the issues of habitat fragmentation (<https://www.environment.gov.au/system/files/resources/dbcf5e19-a1bc-4405-b497-fdcc7c05ab12/files/habitat-fragmentation.pdf>). The review included evidence relating to use of overpasses and underpasses from 28 Australian studies. Looking at the data relating to underpasses most similar to an elevated boardwalk proposal, the review lists evidence of use of culverts and tunnels by animals including antechinus, bandicoot, bush rat, swamp rat, sugar glider, kangaroo, wallaby, possum, echidna, lizard, dragon, skink and frog species, with more limited use by bird species. The findings suggest fauna species found at Bells will likely be able to move under the structure, with movement also enhanced by the removal of the ringlock (grided wire) fencing.

F. Potential GORRSAC site visit

For GORRSAC's proposed site visit to Bells, Council staff can arrange to have a string line installed to demonstrate the deck height and length of the elevated walkway as proposed in the concept design drawings, to avoid any confusion as to the dimensions of the proposed walkway. A height marker or markers can also be provided, as suggested by GORRSAC.

G. Conclusion

Bells Beach has been visited by Wadawurrung People for thousands of years. Wadawurrung Traditional Owners describe it as 'a significant living and gathering place – a place of connection'. Today, Bells Beach remains a vital meeting and storytelling place, connecting indigenous and non-indigenous Australians – locals and visitors alike. Council has been privileged to care for this special place for more than 50 years and understands its significance and the need to respect and protect the natural environment, Wadawurrung heritage and surfing culture of Bells.

The proposal in the CMMP to replace a section of concrete path with an elevated timber pathway is an option that has the potential to assist with range of management issues and

strategic actions, as outlined in this submission. The concept design plans have been developed after consultation with Traditional Owners, reserve users and the Bells Beach Committee and take into account the sensitive coastal location and protection of Wadawurrung heritage, surfing culture and conservation values.

In this submission we have endeavoured to respond to the specific issues raised by GORRSAC in relation to the elevated pathway. The final round of consultation undertaken by Council on the elevated pathway was impacted by an image of the proposed pathway that, in Council officers' view, does not accurately reflect the proposal.

In November 2019, Council adopted the position that if a temporary walkway was installed for the 2020 Rip Curl Pro, it should be built as close as practicable to the dimensions and character of the concept design, to enable additional consultation on the elevated walkway, given the concerns prompted by the altered image. An evaluation of the temporary walkway would then be undertaken in consultation with the Bells Beach Committee and a further report provided to Council recommending the proposed long term solution for this pathway.

Due to COVID-19, the 2020 Rip Curl Pro was cancelled and this further consultation and evaluation did not occur.

Appendices

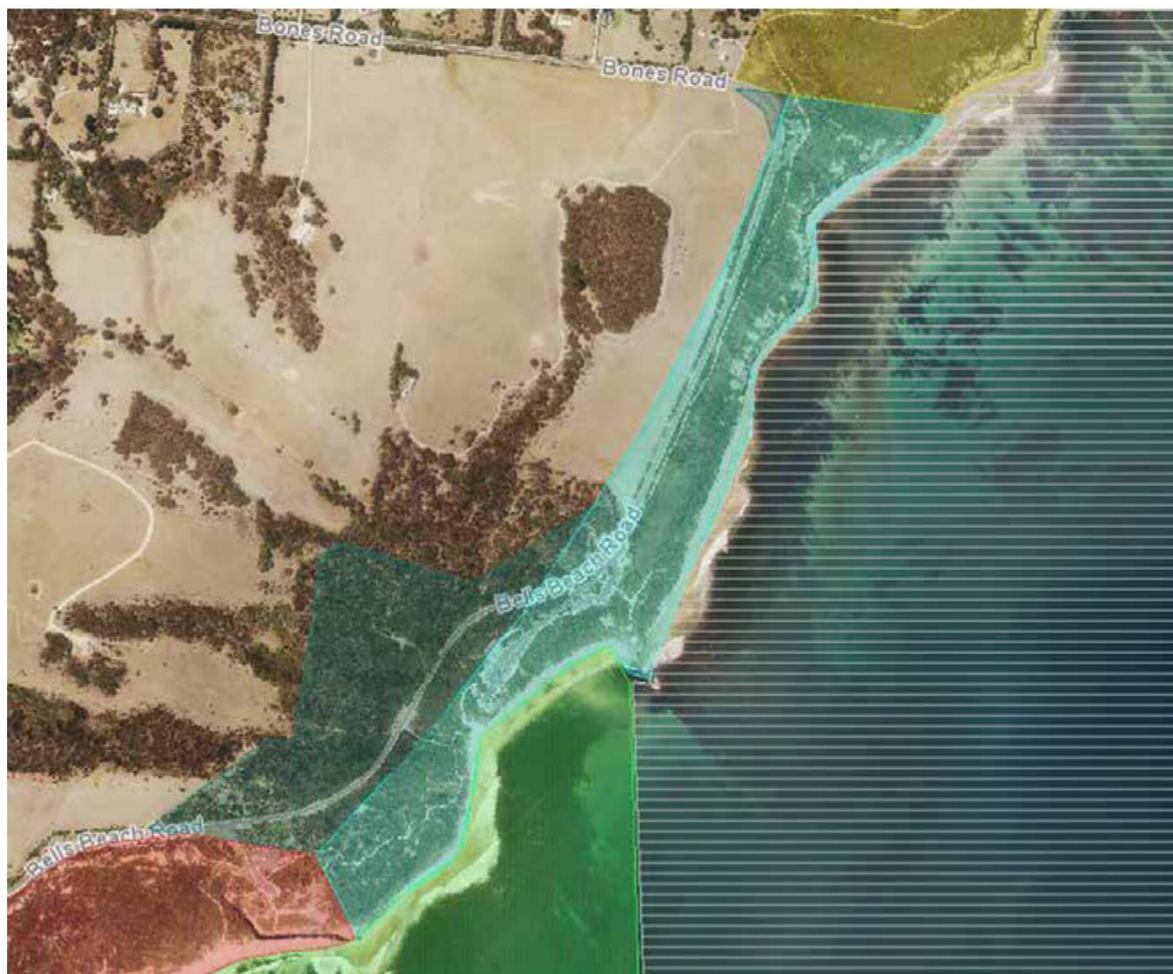
Appendix 1 Land Status and Management Responsibility

Appendix 2 Bells Beach Visioning and Community Engagement

Appendix 3 Recent fauna records for Bells Beach Surfing Recreation Reserve

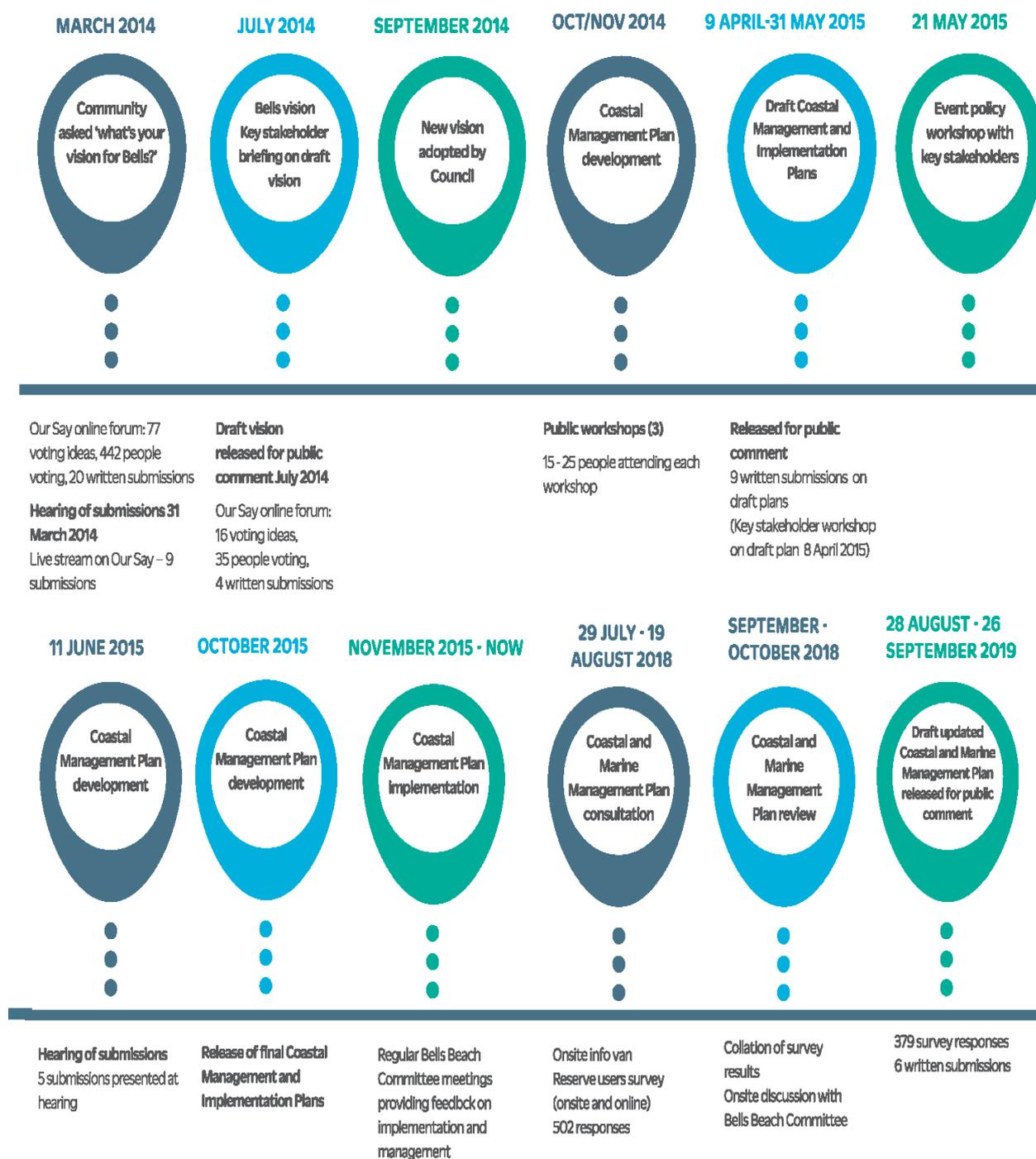
Appendix 4 Site Office Functional Briefing Notes

Appendix 1 Land Status and Management Responsibility



-  Surf Coast Shire managed Crown land
-  Surf Coast Shire freehold land
-  Great Ocean Road Coast Committee managed Crown land
-  Parks Victoria managed Point Addis Marine National Park
-  Parks Victoria managed Great Otway National Park
-  Department of Environment, Land, Water & Planning managed Crown land

Appendix 2 Bells Beach Visioning and Community Engagement



Appendix 3 Recent fauna records for Bells Beach Surfing Recreation Reserve

Results of three fauna surveys at Bells by the Geelong Field Nats

Bell's Beach Foreshore Reserve, Bones Road, fauna survey

11-14 June 2015

GPS at car park 55 263096E, 5750755N, alt 55m

All trapping is carried out in accordance with the conditions in our DELWP permit 10006519 and our WSIAEC permit 27.12

Location

The site chosen for the survey was the heathlands between the Bones Road carpark and the top of the coast cliffs.

The vegetation consisted of stunted Moonah, Coast Pomaderris, Messmate, Yellow Gum, Winged Spyridium, green-flowered Common Correa, Silver Banksia, Seaberry Saltbush, Slender Velvet-bush, Prickly Moses, Common Heath, Cranberry Heath, Coast Beard Heath and various sedges and grasses.

Weather

Mainly fine and sunny but cool to cold.

Elliott traps

We set 40 small Elliott traps in four lines each of 10 traps.

They were baited with a peanut butter, golden syrup and oatmeal mix, a ball of Dacron bedding was in each trap, and they were enclosed in a plastic weather-shield.

Results

12/06/15: E2 Bush Rat *Rattus fuscipes*, wt 99g

E9 Bush Rat, not weighed.

13/06/15: E30 Bush Rat, wt 93g

14/06/15: E11 Bush Rat, wt 90g

Cameras, harps and funnels

These were not used on this survey.

Comments

Although the trapping site was close to the car park, and to residential development, none of the three introduced rodents that we have found in other similar sites were caught. It was also surprising that Swamp Rats were not caught – there was evidence of extensive digging and tunnelling in the area just below the car park.

Wallaby, fox and rabbit scats were abundant and there were some recent echidna diggings.

No herps – frogs or reptiles – were found during the survey.

Thanks

To Surf Coast Shire for encouraging us to carry out the survey.

Alison for suggesting the site, and for the list of plants.

Helen, Lance, Graham and Brett for setting the traps, and Guy, Graham, Brett, Chrissy, Suyeon and Deborah for checking the traps.

Mammals

Short-beaked Echidna	Some fresh diggings noted.
Eastern Grey Kangaroo	At least 20 grazing in the farmland behind the car park.
Black (Swamp) Wallaby	One seen, many scats found.
Bush Rat	Four caught.
Red Fox	Many scats found.
European Rabbit	Many scats and diggings, one skull and a skin found.

Birds

Three Blue-winged Parrots were seen flying overhead.

Rufous Bristlebirds were heard calling.

The Yellow-faced and White-naped Honeyeaters were “streaming” through, apparently in their annual migration northwards along the coast.

Australasian Gannet	Yellow-faced Honeyeater
Whistling Kite	White-eared Honeyeater
Silver Gull	New Holland Honeyeater
Crimson Rosella	White-naped Honeyeater
Blue-winged Parrot	Grey Shrike-thrush
Rufous Bristlebird	Australian Magpie
Superb Fairy-wren	Silvereye
White-browed Scrubwren	Welcome Swallow
Brown Thornbill	Red-browed Finch
Eastern Spinebill	

Bell's Beach, Wave Car-park area, fauna survey

8-11 October 2015

GPS at car-park 55 263096E, 5750755N, alt 55m

All trapping undertaken in accordance with the conditions of our DEPI permit 10006519 and
WSIAEC permit 27.12

Trevor Pescott

Location

The site chosen was north of the Wave car-park at the end of Bones Road. We had conducted a survey there from 11-14 June (see *Geelong Naturalist* Vol.51, No.03, July 2015).

Subsequent to that survey, the body of a male Swamp Antechinus was found on the walking track north of the car-park, and it was decided to look for the species in this survey.

Weather

Mainly fine and warm, although a change came through on the morning of 10/10/15, and on 11/10/15 there was light fog early with mild, overcast conditions later in the morning.

Elliott traps

We set 20 small Elliott traps in two transects each of 10 traps.

E1-10 along the south edge of a gully leading down from the walking path.

E11-20 along another eroded gully further north, also running down from the path.

The bait used was the standard peanut butter, golden syrup and oatmeal mix, and a handful of Dacron filling was placed in each trap for bedding.

Results

09/10/15: E8 Bush Rat, *Rattus fuscipes*, male, wt.138g

E16 Bush Rat, male, wt.145g

E20 Bush Rat, female, wt.142g

10/10/15: E9 Bush Rat, male, wt.145g

E10 Bush Rat, female, wt.159g

E11 Bush Rat, not sexed, wt.157g

E13 Bush Rat, not sexed, wt.157g

E19 Bush Rat, not sexed, wt.142g

11/10/15: E1 Swamp Rat *Rattus lutreolus*, female, wt.115g

E6 Bush Rat, male, wt.137g

E7 Swamp Rat, male, wt. 111g

E17 Bush Rat, not sexed or weighed

Cameras, harps and funnels

Not used in this survey.

Comments

1. Although we did not find any antechinuses, it was good to be able to record high numbers of both Bush and Swamp Rats. Judging by their weights, all were adults.
2. Trap success rate was a very high 24.5%, i.e. 12 animals in 49 trap/nights (we do not re-set traps in which we catch animals until they are cleaned and sanitised.)
3. There was no evidence of introduced rats or mice, although both fox and rabbit were listed.
4. As well as Varied Dusky-blue and Australian Painted Lady butterflies, there were many Heliotrope Moths that although not obvious when at rest, in flight their white wings made them very conspicuous.
5. It appeared that the Blue-winged Parrots we saw were using the heathlands to feed, but were flying inland to the adjacent ironbark forest possibly to nest-sites.

Thanks

Again, thanks to Surf Coast Shire for encouraging the survey on the reserve under their management. It is an interesting area where further surveys may be warranted in the future.

To Geoff for helping set the traps, and Chrissy, Deborah, Guy and Jake, Tara and Eva (Sedy) for checking and collecting the traps

Mammals

Black (Swamp) Wallaby	Several seen.
Bush Rat	Ten caught.
Swamp Rat	Two caught.
Red Fox	What appeared to be a den was found in the eroded gully where the trap line E11-20 was located. There were a number of bones and other material near some holes under the bank overhang.
European Rabbit	Several seen.

Birds

Spotted Dove	New Holland Honeyeater
White-faced Heron	Rufous Whistler
Crimson Rosella	Grey Shrike-thrush
Eastern Rosella	Australian Magpie
Blue-winged Parrot	Pied Currawong
Horsfield's Bronze-Cuckoo	Little Raven
Superb Fairy-wren	Eurasian Skylark
Rufous Bristlebird	Silvereye
White-browed Scrubwren	Welcome Swallow
Brown Thornbill	Common Blackbird
Red Wattlebird	

Bell's Beach, Wave Car-park area, fauna survey

16-17 April 2016

The Geelong Field Naturalists undertook further fauna survey work near the Wave car park on 16 and 17 April. During this survey they found several Bush Rats and Swamp Rats and they also found one female Swamp Antechinus (*Antechinus minimus*). The finding was reported by Trevor Pescott.

Arthur Rhyllah Institute survey work 2006-07

Table 15. Fauna species recorded at Bells Beach Surfing Recreation Reserve by ARI, October 2006-March 2007.

Common name	Species
Short-beaked Echidna	<i>Tachyglossus aculeatus</i>
unidentified Antechinus	<i>Antechinus</i> sp.
Common Brushtail Possum	<i>Trichosurus vulpecula</i>
Sugar Glider	<i>Petaurus breviceps</i>
Common Ringtail Possum	<i>Pseudocheirus peregrinus</i>
Eastern Grey Kangaroo	<i>Macropus giganteus</i>
White-striped Freetail Bat	<i>Tadarida australis</i>
Gould's Wattled Bat	<i>Chalinolobus gouldii</i>
Lesser Long-eared Bat	<i>Nyctophilus geoffroyi</i>
Little Forest Bat	<i>Vespadelus vulturnus</i>
Black Rat	<i>Rattus rattus</i>
Dog	<i>Canis familiaris</i>
Little Pied Cormorant	<i>Phalacrocorax melanoleucos</i>
White-faced Heron	<i>Egretta novaehollandiae</i>
Straw-necked Ibis	<i>Threskiornis spinicollis</i>
Black-shouldered Kite	<i>Elanus axillaris</i>
Wedge-tailed Eagle	<i>Aquila audax</i>
Nankeen Kestrel	<i>Falco cenchroides</i>
Silver Gull	<i>Larus novaehollandiae</i>
Brush Bronzewing	<i>Phaps elegans</i>
Crimson Rosella	<i>Platycercus elegans</i>
Superb Fairy-wren	<i>Malurus cyaneus</i>
Rufous Bristlebird	<i>Dasyornis broadbenti</i>
White-browed Scrubwren	<i>Sericornis frontalis</i>
Brown Thornbill	<i>Acanthiza pusilla</i>
Red Wattlebird	<i>Anthochaera carunculata</i>
Singing Honeyeater	<i>Lichenostomus virescens</i>
White-eared Honeyeater	<i>Lichenostomus leucotis</i>
Brown-headed Honeyeater	<i>Melithreptus brevirostris</i>
New Holland Honeyeater	<i>Phylidonyris novaehollandiae</i>
Rufous Whistler	<i>Pachycephala rufiventris</i>
Grey Shrike-thrush	<i>Colluricincla harmonica</i>
Grey Fantail	<i>Rhipidura fuliginosa</i>
Black-faced Cuckoo-shrike	<i>Coracina novaehollandiae</i>
Australian Magpie	<i>Gymnorhina tibicen</i>
Little Raven	<i>Corvus mellori</i>
Richard's Pipit	<i>Anthus novaeseelandiae</i>
Welcome Swallow	<i>Hirundo neoxena</i>
Silvereye	<i>Zosterops lateralis</i>
Common Blackbird	<i>Turdus merula</i>
Common Starling	<i>Sturnus vulgaris</i>
Garden Skink	<i>Lampropholis guichenoti</i>
White-lipped Snake	<i>Drysdalia coronoides</i>

Appendix 4 Site Office Functional Briefing Notes February 2019

SITE OFFICE

Landscape Architecture & Urban Design
18 Lincoln Street Brunswick East VIC 3057
PO Box 2126 Brunswick East VIC 3057
Phone (03) 9384 6934
Web www.siteoffice.com.au

WINKIPOP ELEVATED BOARDWALK

Functional Briefing Notes
Prepared by Site Office
February 15th 2019

BOARDWALK SIZE

Width = 2.5m (approx. 3.6m between existing fence line).
Height = to allow views above existing vegetation without being visible from the water.
Gradient = Relatively flat, although some slope acceptable (existing path gradient approx. 1:40).

LOADING

Live load = tbc
Relevant Australian Standards = tbc

VISUAL IMPACT

Little or no visual impact from the water.
Do not use shiny, reflective or bright materials (e.g. galvanised steel).
Allow views of water and break (i.e. above height of vegetation).
Utilise materials that are sympathetic to the local environment.
Minimise infrastructure footprint (i.e. keep as small as possible).

MATERIALS

Low embodied energy.
Sustainable sourced.
Can be recycled / reused at end of useful life.
Does not leach material into the environment.
Can withstand harsh coastal environment.

FUNCTION ISSUES

Avoid slippery surfaces (e.g. safety).
Provide surfaces that can be walked across in bare feet (e.g. surfers) – comfort.
Allow use as event viewing platform during Rip Curl Pro (i.e. replace existing temporary scaffold).
Deck to be as permeable as possible, to allow light beneath the boardwalk (to allow vegetation to grow).
Minimise potential for erosion / resolve existing areas of existing erosion.
Wherever possible, make access more compliant (this may not be always possible).

INTEGRATION WITH LANDSCAPE

Avoid loss of any existing vegetation (i.e. keep within the 3.6m fence line footprint of the existing path).
Allow light beneath structure to allow vegetation to grow beneath.
Remove existing concrete and gravel pathway (it can channel stormwater and contribute to erosion).
Avoid pruning of existing vegetation.
Minimal / no visibility from the water.