

Jeremy Loftus-Hills
127 Kangaroo Ground Rd
Warrandyte

Wednesday, 26 October 16

The Manager
Manningham City Council
Planning Section
C/o Peter McWhinney
(Email)

Re: PL16 026256. *Proposed sub division 8-20 Keen Avenue Warrandyte*

I object to the current plans on the following grounds

1. The establishment of yet another narrow cul de sac on bushfire prone land. While this is a matter for the CFA, it is also of concern to the general population if pockets of housing are being constructed along hard to get at places along dead end streets. Judging from the swept path diagrams, [showing accessibility for service vehicles (8.8 metres) only], it will not be easy for a fire truck to navigate the private road marked as **common property** on the plan of sub division. This is especially true if there are cars parked outside any of the lots.
2. Failure to define the nature of controls and enforcement affecting the **building exclusion zone**. It's impossible to predict the immediate or long term impact of such an arrangement since the advertised materials give no indication of the nature of the controls over the use of private land in that zone.
3. No plan to manage **stormwater drainage** – especially siltation, erosion and toxic run off impacting Andersons creek and consequently the Yarra river.
4. The development of **a sub division with a distinct character**, (potentially a gated community) accessed exclusively via a private road ('common property') runs counter to the style of the local built environment in particular and the character of the Warrandyte community in general.
5. **The imbalance of private and public interest** in terms both of the conservation of vegetation and the design and development principles that control the land. Giving rise to an excessive number of allotments at a potentially high cost to the environment and to amenity.
6. The **extent of cut and/or fill** required of the private road marked as common property on the plan of sub division.
7. The **building exclusion zone** on lots 2-4 means that the building envelopes are pushed foreword on their respective lots (which have a frontage of 22 metre or less) and therefore dwellings will be bunched together along the road. This contradicts the design and development characteristics explicit in DDO3, especially in terms of set backs/visibility from the road.
8. The uncertain **status of the private road** described as 'common property'. For the purposes of the planning scheme and construction requirements, is it a road or a private driveway?
9. The **Yarra St road reserve** is unusually wide but is nevertheless public land. I am in principal vehemently opposed to developers using it to enhance their offering.
10. The regimented **streetscape design** and the use of 'infill' as a rationale for high density development are contrary to both the neighbourhood character described in DDO3 and the controls explicit in design and heritage principles

regulated by the heritage overlay East along Yarra St. I speak for the many residents who hope that the heritage values expressed in that overlay will one day extend as far as the neighbourhood activity centre (Goldfields). The sub division as set out in the application pays no attention to that issue and if permitted would put paid to that aspiration.

11. The abuse of the **Bushfire Management Overlay** as a rationale for vegetation removal, especially remnant patches like that on lots 3 & 4. There needs to be a balance between the use of land for dwellings and Warrandyte's treed streetscapes and bushland feel. This requires a more creative, environmentally (and Warrandyte) friendly design.
12. **Traffic generation**/vehicle and pedestrian safety. While I appreciate that this is largely an issue for VicRoads, the creation of a private road as common property will likely introduce authority delineation issues between Local and State government. (Already limiting the effective and efficient management of the East bank of Andersons Creek). This would jeopardise the best design and use of the private road.
13. The intersections of the service road with the main road are already dangerous. This sub division risks doubling traffic flows along the service road. I am concerned that ineffective or absent controls would increase **risks to personal safety** in the vicinity of the sub division.
14. There are **better, albeit less profitable designs** that would lead to improved environmental outcomes and not detract so much from local amenity. Therefore at the very least the averaging rule should not be applied.
15. The proposed design is **out of sympathy with its neighbourhood**. Therefore at the very least the averaging rule should not be applied.
16. The use of **space for access to roads and driveways** is not minimised to maintain the unique character of the area and preserve as much vegetation as possible. Rather, the use of space is driven by the desire to maximise profit from the sale of the allotments. Therefore at the very least the averaging rule should not be applied.
17. I understand that this land was used intensively by indigenous tribes and I am yet to be convinced that the plan of sub division pays adequate attention to the underlying **cultural heritage issues**.
18. The removal of vegetation in terms of isolated permit applications will do nothing but erode the functioning of the Andersons Creek corridor.
19. The use of official records for evidence of the ecological value of the on site vegetation would be of value if local monitoring activities were robust and ongoing. The sightings listed in the biodiversity report are as much a reflection of spasmodic audits as they are of fauna activity.
20. Yellow Box grassy woodland is a threatened vegetation class under the EPBC Act for good reason. Landowners need to be encouraged to conserve and restore this EVC wherever possible. The remnant patch of mature trees on this title provides an opportunity for better management of the creek corridor – one of a declining pathway between Fourth Hill and the Yarra.

Regards

Jeremy Loftus-Hills