

Objection to Planning Permit Application

Name:	
Postal address:	
Telephone number:	
Email address:	
What is the permit application number?	116/2021/P
What is proposed?	14 Dwelling Apartment Building with Basement Parking
Application address?	48 Railway Parade, Seaford
Who applied for the permit?	Fletcher Development Consultants Pty Ltd

What are the reasons for your objection or submission?

For Seaford Village, this will be the first development of this scale and it is vital that the proposal be held accountable to the current ResCode requirements. Seaford Village is a very special environmental place and with appropriate planning it should remain so.

For the purpose of this objection, as Frankston's Schedule 1 to Clause 32.08 General Residential Zone has "none specified" for all of the Requirements of Clause 54 and Clause 55, I have referenced the Residential Development Standards (ResCode). These standards are extremely generous and I see no reason why they should be over-ridden.

Building Height 55.03-2

The General Residential Zone (GRZ) mandates a **maximum building height of 11 metres**.

The VPA Glossary describes Building Height as: The vertical distance from natural ground level to the roof or parapet at any point. (<https://vpa.vic.gov.au/glossary/>)

Since the roof balustrades constitute a parapet, they need to be included in any height with the result this proposal **exceeds the maximum 11 metres** on all elevations. It is **not 9.93m** as stated by the applicant.

Elevations	Height to Roof	Plus Balustrade	Total Height
West	10.10m	1.7m	11.80m
	10.20m		11.90m
East	10.15m	1.7m	11.85m
	9.90m		11.60m
North	9.93m	1.7m	11.63m
South	10.10m	1.7m	11.80m
	10.20m		11.90m

The GRZ also mandates a maximum 3 storeys (excluding basement provided it is below ground). Although the roof terrace is not technically a storey, this proposal references a FIVE level building

including basement under 55.05-01 Accessibility Objective. Visually it also appears more than 3 storeys due to the lack of appropriate setbacks.

Building Setbacks 55.03-1 and 55.04-01

As buildings get higher, the GRZ setback is mandated to increase to retain an open neighbourhood aspect but this has not been applied to these plans. The result is an overpowering presence in an area of low housing, with only the front setback standard being met.

Building Setback: Minimum horizontal distance from the allotment boundary to building.

My interpretation of the correct setbacks for this property is as follows:

	Proposed Setbacks	GRZ Minimum setbacks for 11m building
Railway Pde Setback (Front)	6.000m	6.000m Standard A3 and B6 for streets in a Road Zone, Category 1
Railway Pde less Balcony Overhang Dwelling 12 (3 rd Storey, over 3.6m high)	5.510m	6.000m - Verandahs that are less than 3.6 metres high and eaves may encroach not more than 2.5 metres into the setbacks
McKenzie St Setback (Side Street, 3 rd storey)	2.500m	3.000m Standard A3 and B6 for two or more dwellings on a lot (Clause 55)
McKenzie less Balcony Overhang Dwelling 11, 3 rd Storey (over 3.6m high)	0.700m	3.000m as no eaves and higher than 3.6m
Side Setback (North boundary, 3 rd storey)	1.300m	6.100m Standard A10 and B17
Side less Balcony Overhang (Dwelling 7, 2 nd storey)	1.000m	6.100m – allowable encroachment chimney or eave 0.50m
Rear Setback (East boundary, 3 rd Storey)	4.900m	6.100m Standard A10 and B17
Rear less Building Overhang (Dwelling 10, 2 nd Storey)	2.000m	6.100m – allowable encroachment chimney or eave 0.50m

From PPN27-Understanding-the-Residential-Development-Standards-ResCode_June-2015

	<p>Standard A10 and B17 for Rear and Side setbacks requires: if no distance is specified in the schedule to the zone, 1 metre, plus 0.3 metres for every metre of height over 3.6 metres up to 6.9 metres, plus 1 metre for every metre of height over 6.9 metres.</p> <p>Sunblinds, verandahs, porches, eaves, fascias, gutters, masonry chimneys, flues, pipes, domestic fuel or water tanks, and heating or cooling equipment or other services may encroach not more than 0.5 metres into the setbacks of this standard.</p> <p>The chimney and eaves are allowable encroachments provided they do not encroach more than 500mm into the setbacks of this standard.</p>
<p>Formula: $1\text{ m} + [0.3\text{ m} \times (6.9\text{ m} - 3.6\text{ m})] + [1\text{ m} \times (h - 6.9\text{ m})]$ h = wall height</p> <p>For an 11m building this equates to a total setback of 6.10m (rounded) at the roofline or</p> <p>1.00m for first 3.6m of height</p> <p>0.99m for next 3.3m (3.3x0.3)</p> <p>4.10m for next 4.1m (4.1 x 1.0)</p>	

Car Parking (Clause 52.06-5)

Although the site is in close proximity to the Railway Station, a major part of the transport network servicing this area is provided by Eastlink and Peninsula Link. Employment nodes are found in Greater Dandenong, Monash and Casey. For convenient and timely commuting, all these destinations require a car not bike or train. It can safely be assumed that all apartments will require car parking.

On first inspection, the innovative use of car stackers will meet the requirement of 1 car space per 2 bedroom apartment (i.e. 14 spaces). The question becomes will those spaces be fit for purpose or result in half the residents choosing to park their cars in the street.

New car sales for 2019, have **SUVs accounting for 45.5 per cent** market share, up from 43 per cent in 2018. The number one seller across all categories was the Toyota Hi-lux followed by the Ford Ranger. Top SUV was the Mazda CX-5. This is my understanding of the specs as shown in the plan vs the reality of common Australian vehicle dimensions.

Minimum Requirements in metres	Width	Length	Headroom	Access Lane	Weight In KG
Standards Aust Single Garage	3.000	5.400	2.300		
Car Parking Spaces 90° Min Clause 52.06-9 Table 2	2.600	4.900	2.100	6.400	
Proposed Plan (GTV1750, H 2950)	2.700	5.300	1.500 upper 1.550 lower	5.440	
Klaus Multiparking Recommendations	2.500	5.500		6.500	2000Kg
Toyota HiLux	1.855	5330	1.815	N/A	2080Kg
Mazda CX-5 (medium SUV)	1.840	4.550	1.675	N/A	1510Kg
Toyota Prado (large SUV)	1.885	4.995	1.845	N/A	2240Kg

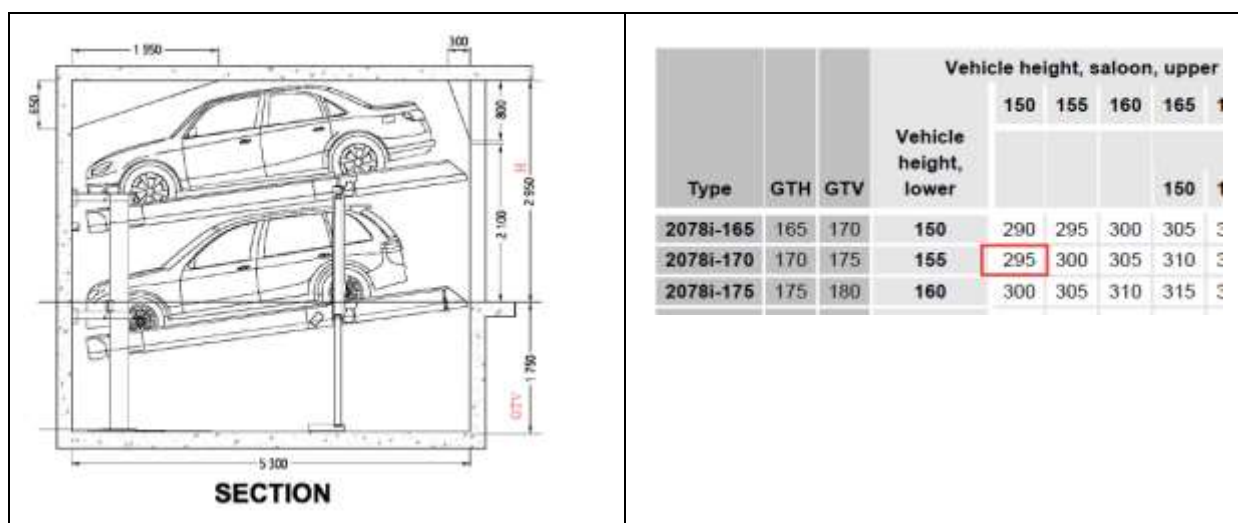
All measurements are extremely tight for opening doors to exit the vehicle and no consideration appears to have been given to **disabled parking** (AS2890.6-2009).

Some of the vehicles are simply too high to fit.

55.03-10 indicates all vehicles will be able to turn smoothly and leave the carpark in a forward motion but the guidelines from Klaus and 52.06-9 give the impression the access lane is not wide enough to do this by at least 1 metre.

<https://www.caradvice.com.au/817278/vfacts-2019-new-car-sales-results/>

[https://en.wikipedia.org/wiki/Garage_\(residential\)](https://en.wikipedia.org/wiki/Garage_(residential)) & <https://buildsearch.com.au/garage-size>



Visitor Car Spaces

As the land in question is on a very busy intersection controlled by traffic lights, virtually the entire streetscape is designated 'No Standing' by VicRoads regulations and signed appropriately. As such, it is unable to accommodate any visitor cars let alone the 2.8 spaces required for this size building. Suitable parking **must be** accommodated on the property to ensure the safety and amenity of the neighbourhood.

Railway Parade - No Standing for entire block



McKenzie Street – No Standing almost to crossover



Stormwater Management

The proposal's claim that Stormwater discharge from the site will remain at predevelopment levels is preposterous (11.03-4S Coastal Settlement). This is not plausible when the majority of the land is currently permeable garden. As such, consideration of how this increase in flow will be handled is vitally important to the residents of all the neighbouring streets who frequently experience flooding. The Melbourne Water drainage to the Wetlands is unable to manage existing flows when heavy rains occur. The capacity for ever increasing stormwater flows is simply not sustainable in this region. And heavy rains are becoming more frequent!



For a building that is touting itself as 'sustainable', I am surprised to see no provision for water tanks. In particular, detention tanks would help to alleviate the initial rush of stormwater into the drainage system.

There is also no mention of how excess stormwater accumulated in the basement will be removed.

Ground Water Management

The LXRA rejected a trench style crossing removal at Seaford because of the adverse impact to ground water in this sensitive environment.

(<https://levelcrossings.vic.gov.au/media/publications/seaford-technical-report>) Their modelling in 2017 of long term impacts is displayed in the image below. Obviously one basement would not have the same impact, but it will have some impact. Further, if this is then used as a precedent for similar development all along Railway Parade the impact will certainly be far reaching.



Aboriginal Cultural Heritage (15.03-2S)

It is understood that a cultural heritage management plan will be required. Emphasis should be placed on the fact that a major removal of sand will be required to excavate to a depth of at least **4.70m not 2.95m**. (Basement 2.95m plus pit cavity for stacker 1.75m plus foundation.)

Existing Vegetation

Just an observation that it now appears to be common practice to remove all vegetation from a site before the arborist prepares his report. I have seen this occur at several locations. If there was a tree of significance it conveniently disappears. Is there no way of preventing this?





All trees gone!



How will you be affected by the grant of this permit? (if applicable)

I acknowledge that the site in question is under-utilised based on the ever increasing demand for housing. That said, it should be appropriately developed with consideration for the neighbourhood not just the profit to be made. The developer should leave behind a building that will be valued by the community.

The Minister for Housing, The Honorable Richard Wynne MP, in his forward to Reformed Residential Homes 2017 stated:

“The reformed residential zones get the balance right. They provide for the protection of the character and liveability that people love about Melbourne’s suburbs and support growth in the right areas. Our suburbs have a unique character that’s loved and valued by their residents. It’s important that we preserve what makes our suburbs great places to live, such as our heritage, trees, garden areas and streetscapes. Protecting these special characteristics is a priority for this Government. But it has to be balanced against the challenges that our increasing population brings..... The Government’s reforms protect the low scale and open character of Victoria’s suburbs by strengthening mandatory height controls.”

Mandatory heights and setbacks form part for our residential zones to ensure **we get that balance right** and they should not be abused or worse still, ignored, as is the case with this proposal.

The proposal, if passed in its current state, will degrade the amenity of the neighbourhood, not contribute to its sustainability or liveability (11-02-2s). Neither will it add to neighbourhood character as the design is not site responsive (15.01-5S). By overcrowding the development on this single block, the neighbourhood character will be destroyed.

The proposal states it will create urban environments that are safe, healthy, functional and enjoyable (15-01-S Urban Design). I have serious concerns that excessive and inappropriate street parking will result in a very unsafe environment, in particular, for the neighbouring primary school children.

Passive surveillance of the public realm in Railway Parade and McKenzie Street (15.01-3S) will not promote community safety. It will simply remove privacy for many homes.

With similar sized apartments selling for \$500,000 to \$700,000 along Nepean Highway it can be expected the value of this development will be at least \$7 MILLION. Estimated costs are \$2.3M and sales price of the site was \$830,000, so the expected profit is obscene.

A smaller number of apartments with the appropriate height and setbacks would still realize a very healthy profit, meet diversified building needs and keep the open character of the neighbourhood.

Name:	
Signature/s:	
Date:	