



Darebin Appropriate Development Association

DADA 'Vague' Planning Objections and Reasons

Some of these seem repetitive. Choose which best suit your site and application and be sure to include all your reasons.

WHAT ARE THE REASONS FOR YOUR OBJECTION?

PROCESS/POLICY:

1. The public notice referred into Section 55 of the planning an environment Act was posted on the property during the day on DD/MM/YY, with a deadline DD/MM/YY. The notice should be posted for at least 14 days before the deadline for objections.
2. The proposed development of only one and two bedroom units will not provide appropriate housing to meet projected housing needs in the future in Darebin
3. Does not reflect Darebin Council preferred Character Statement for Precinct C2
4. The proposed development does not meet minimum residential code requirements
5. There is an oversupply of 1 and 2 bed room apartments in Darebin, and an undersupply of housing for families. This development adds to the imbalance.
6. The multiple dwellings proposed appear to conflict with items in the Darebin City Urban Character statement: *"While infill development of units and townhouses has occurred throughout the precinct, there are still many streets [e.g., Rubicon street] that are distinct for their consistency of era of development, regular site sizes, setbacks, building styles or scale. Within each streetscape there is an established **rhythm of dwelling spacing... creates a sense of openness in the streetscapes**"*
7. The number of objections indicates the scale of a negative social effect on the community.

WASTE MANAGEMENT:

1. The provision of some storage space around the single garage is insufficient and this will displace the refuse bins (rubbish plus recycling container) onto the street.
2. The plans show rubbish bins are to be stored inside the premises. Rubbish bins eventually stink, making it unattractive to store them inside the property. The only other storage option is on the nearby street footpath or nature strip.
3. The proposed management of waste collection is inadequate and will further disrupt the amenity of the neighbourhood.
4. The provision of services for rubbish storage and removal are inadequate.
5. Household waste management is reliant on building-wide systems

AMENITY:

1. The proposal does not provide private open space for the residents
2. Loss of amenity of neighbourhood – overcrowding, rubbish bins, safety (children) lane congestion (unsafe ingress /egress)
3. Such a large development will destroy the amenity surrounding residents and visitors to the area currently enjoy.

4. There is inadequate usable open space, and is not in the spirit of the Darebin Planning Scheme
5. Lack of adequate natural light within the apartment.
6. The design does not supply adequate private open space.
7. Apartments 2-5 have insufficient private open space, each with just a small upstairs balcony of about 8 square meters. Such a small amount of private open space is inconsistent with the neighbourhood character.
8. Lack of controlled sunlight access to apartments.
9. Apartments are too small or poorly planned.
10. External noise.
11. Acoustic privacy.
12. Access to outdoor spaces from apartments.

LANDSCAPING, GARDENS AND VEGETATION:

1. The proposal does not include a landscape plan to sufficiently describe the replacement of significant vegetation lost.
2. The proposal does not include replacement vegetation.
3. The site provides inadequate landscaping opportunities.
4. The development will damage existing trees.
5. The proposal does not include a landscape plan to sufficiently describe how the development will integrate with the established landscaping features of the neighbourhood including semi-mature and informal gardens or demonstrating how the significant vegetation lost will be replaced
6. The proposal does not include details on the proposed fence details on XXX Street and XXX Street. The neighbourhood consists typically of low, typically wooden, picket fences.
7. Landscaping: The proposal does not provide provision for landscaping on the southern and western boundaries that will soften the significant visual impact of the proposal. Similarly, the landscaping provisions on the eastern and northern boundaries are insufficient to offset the proposed visual impact.
8. Removing the large tree from the front to accommodate the number of units and a lack of arborist report also appears to be in conflict with the Community Values: "*Trees in the streets and private gardens.*"
9. Intensive urban development affects the landscape

NEIGHBOURHOOD CHARACTER AND HERITAGE:

1. The proposal is inconsistent with the neighbourhood character of the area
2. The proposed development does not respect preferred sustainability characteristics of the area, including the protection of vegetation on the block.
3. The proposal is inconsistent with the neighbourhood character of the area. With the expectation of the local public housing developed under different planning guidelines, all nearby houses are single story, free standing, principally Federation era houses. These have established front and rear gardens providing residents with generous private open space.
4. Loss of neighbourhood character. High density housing is not family friendly in a predominantly family neighborhood.
5. The planned development does not fit the preferred neighbourhood character.
6. The planned development does not include links to the local community via street based business or shared space opportunities.
7. The development dwarfs the heritage building so that it's cultural and historic significance is lost.
8. There appears to be no other justification for this development other than financial gain. The existing dwelling is in good condition and upholds all the ideas set out in the Darebin City Character statement. Removing the house and replacing it with X units will not realize a net gain for the community.
9. Apartments are not suited to people of all ages and abilities because....

TRAFFIC AND PARKING:

1. The proposed development lacks adequate car parking spaces on the site
2. **The waiver for visitor parking will result in there being a lack of parking for first responders in an emergency.**
3. The on-site basement car parking and bicycle storage is inadequate for the number of apartments.
4. The usage and traffic movements will hinder Station Street through-traffic, and increase traffic in surrounding streets.
5. Increased traffic in an already congested street and block of flats.
6. Insufficient off street parking amenity for current residents – this will be exacerbated by more residents
7. Inadequate new off- street parking spaces – therefore increased street parking
8. Traffic and parking congestion will be an issue as the proposed development will increase both. The increased congestion in the street will also pose a significant risk to the safety of the many children and elderly who use the street to walk to nearby schools, kindergartens and community activities.
9. XXX Street leads to XXX School, and is used by parents to drop off and collect their children. The development will add more traffic to school rush hour
10. The development provides too few parking spaces for the residential and commercial tenants.
11. Access to parking spaces is via a single car width rear lane way to and from Hawker Ave. The lane must accommodate two way traffic, for 30+ vehicles, yet provides no space to turn around. Parking access creates dangerous situations and is unworkable
12. There is currently insufficient parking along XXX Street and XXX Street at school pick up times, during church services and on weekends.
13. The waiver for additional visitor parking will place additional strain on these streets including XXX Street at the corner of the proposed development at these times.
14. The bulk of residents on XXX Street, XXX Street and XXX Street do not have off street parking. It is reasonable to assume that most households have 2 cars, therefore this strain on parking is likely significant.
15. Access to and egress from the site is dangerous.
16. Garage dimensions are turning swing path are too small.
17. There is not adequate parking provision in the planned development.
18. The traffic management study attached to the application does not accurately apply to the specific location.
19. There is a question of an adverse possession claim on the entry and exit route from the planned development.
20. The proposal does not provide adequate car parking for the residents or their visitors.
21. The proposal does not provide adequate space for the loading bay servicing the tokenistic cafe.
22. The development consumes the entire site with minimal space to store building materials and park the workers vehicles. This will lead to traffic congestion on the neighboring streets and place obstacles on the footpaths.
23. Impact of on-site car parking provision on building design
24. Parking space is too small for normal sized passenger vehicle such as a car

ENVIRONMENTALLY SUSTAINABLE DESIGN (ESD):

1. The proposed development does not include adequate Environmental Sustainable Design features
2. The 3 storey building blocks solar access for the residents of units at the rear of the property.
3. The application does not meet appropriate environmental ratings.
4. The proposal does not respect preferred sustainability characteristics of the area, including the protection of vegetation on the block, nor does it maintain the character of large front and rear gardens.
5. Lack of adequate natural ventilation of apartments.

6. Apartment buildings will last a long time but are difficult to modify once built.
7. Design of apartment buildings affects household energy and resource consumption
8. The proposed developed does not show the placement of air-conditioning units the noise of which are likely to breach EPA noise limits/restrictions.
9. Air conditioners cannot be located for the noise from them to meet:
 - Environmental Protection Act 1970 Section 48
 - EPA's Environment Protection (Residential Noise) Regulations 2008
 - EPA's Noise Control Guidelines Publication 1254
- 10.

OVERLOOKING AND OVERSHADOWING:

1. The dwelling includes overlooking windows into neighbours yards
2. Overlooking / loss of privacy.
3. The balconies over look nearby gardens and residential properties.
4. The balconies at the rear of the development overlook the windows, adjacent gardens and open space.
5. Achieving a quality outlook from all apartments.

DENSITY AND SCALE:

1. The proposed application is an overdevelopment for this site.
2. The proposed building footprint is too large on the site.
3. Does not respect existing height and setbacks of neighbouring buildings.
4. The scale of the 6 storey development leads to overshadowing and overlooking of nearby single and double storey properties.
5. Taking into account the predominant single story, free standing houses in the immediate vicinity, the proposed application is an overdevelopment for this site.
6. Building site mess and congestion. The development consumes the entire site with minimal space to store building materials and park the workers vehicles.
7. The visual bulk from the built scale of the proposed development will be very imposing as it will be visible from surrounding properties and the street.
8. Bedroom sizes most are less than 3 metres in length 2.8x2.7 and 2.9x2.7 - Many of the 30 apartments do not have windows in the bedrooms. This is not good urban design, it will be growing mould in the rooms due to lack of sun light making residents sick.
9. Height and scale of the proposed development is too large, intense and intrusive.
10. Bulk Look of the Building – Planning concerns that the development is out of scale to surrounding buildings, its excessive and out of character to the surrounding area and environment. XXX is a heritage area. This type of development does not fit in with the heritage look and is out of line with the street scope.
11. Accuracy of diagrams and drawings in the application, specifically in regards to size and intensity, overshadowing, colours and finishes are not accurate.
12. Building on the boundary to fit four units also appears to be in conflict with the following Preferred Character Statements in the document: ***"There are opportunities to introduce well designed, contemporary architectural styles that **adopt the established front and side setbacks to ensure consistency of dwelling spacing and adequate garden areas.**"***

BUILDING SERVICES:

1. The building plans do not show the location of the building services - hot water system, heating and cooling units. If these are to be placed in the "service yard", then access to the south facing ground floor "clothesline" is blocked.

2. Poorly-defined entrances.
3. Inactive building frontages.
4. Long internal corridors.

OTHER:

1. Air conditioning noise will not meet EPA standards.

PROVISION OF A LOADING BAY FOR MIXED USE RESIDENTIAL AND BUSINESS:

PEDESTRIAN SAFETY:

1. Rubbish and recycling bins placed on the street are an obstacle to pedestrian and vehicle access.

HOW WILL YOU BE AFFECTED BY THE GRANT OF A PERMIT?

PROCESS/POLICY:

WASTE MANAGEMENT:

1. Rubbish and recycling bins placed on the street are an obstacle to pedestrian and vehicle access.
2. Amount of waste sent to landfill.
3. Excess of organic waste in landfill.
4. Increased consumption through lost recycling opportunities.

AMENITY:

1. The proposal creates cramped accommodation that will have a negative impact on the mental health of the inhabitants and neighbours.
2. A family would not be able to live in these units.
3. Quality of life.
4. Increased energy usage due to need for artificial light.
5. Ability to enjoy warming sun.
6. Thermal comfort.
7. Increased energy use due to artificial light, heating and cooling.
8. Peak energy demand.
9. Climate change adaptation.
10. Household diversity.
11. Internal amenity.
12. Flexibility of use.
13. Inadequate storage.
14. Sleep disturbance.
15. Health and wellbeing.
16. Privacy.
17. Quality of life.
18. Social interaction and safety.
19. Household diversity (especially households with children).
20. Noise.

LANDSCAPING, GARDENS AND VEGETATION:

1. Climate change mitigation and adaptation.
2. Urban heat island effect.
3. Ground permeability and storm-water management.

4. Quality of public realm.

NEIGHBOURHOOD CHARACTER AND HERITAGE:

1. The design conflicts with the neighbourhood character.
2. We understand that progress is necessary in a growing city, however, we do not want a precedent to be set that reduces the beauty of the street and does not aspire to the ideals in the Darebin City Preferred character statement.
3. Unit 4 would become the smallest single residential structure on XXX Street and this proposed development is the first of this kind. As a result, the proposed view from the street front looks crowded and clumsy next to its adjoining neighbours. We feel we owe it to our community and our neighbours to object to this development for the sake of maintaining a beautiful and pleasant living environment for all.
4. XXX Street is a beautiful street with well-maintained and well-established houses. We feel it would be a shame if this current proposal encouraged developers to buy character homes and knock them down to build 4 units on each block without consideration for trees, vegetation, existing styles and without considering carefully how it will affect their neighbours.
5. Household diversity.
6. Social equity.
7. Accessibility.

TRAFFIC AND PARKING:

1. The site cannot provide adequate space and car parking for the residents or their visitors, and the search for alternatives will adversely affect the amenity of the locality.
2. **Lack of parking for first responders in an emergency could result in the death of a family member or visitor.**
3. The rear entrance to the site offers poor visibility of the laneway, (e.g., consider making a 90 degree turn whilst entering or exiting the property backwards) which compromises the safety of other vehicle and pedestrian users of this public thoroughfare.
4. The absence of nearby public car parking introduces additional vehicles onto the adjacent private car park for XXX Church/business patrons and to the limited parking spaces available on residential Streets joining XXX.
5. The loss of nearby public car parking will prevent public access to the reserve and introduce additional vehicles to the limited parking spaces near the intersection of this corner block.
6. Public realm and pedestrian amenity.
7. Loss of interaction with streetscape due to podium (above ground) car parking.
8. Noise and air pollution.
9. Visual impact of podium car parks.

ENVIRONMENTALLY SUSTAINABLE DESIGN (ESD):

1. Health and wellbeing.
2. Thermal comfort.
3. Increased energy loads for heating and cooling.
4. Internal air quality and condensation.
5. Future value and use.
6. Sustainability.
7. Climate change mitigation and adaptation.
8. Thermal comfort.
9. Whole-of-life cost.

OVERLOOKING AND OVERSHADOWING:

1. There is a loss of privacy and sunlight for the inhabitants of the adjoining properties.

2. Quality of life.
3. Surveillance of the street.
4. Privacy of neighbours.
5. Privacy of resident.

DENSITY AND SCALE:

BUILDING SERVICES:

1. Poor security or sense of address.
2. Poor internal amenity.
3. Visibility and safety.

Appendix Objection categories

This table is incomplete and requires contributions for those who are familiar with the LPPF, and any other relevant policy, rules and guidelines. The ordering and number of categories may also require changes to remove, merge or add others not yet listed.

Table 1 Broad categories of reasons for objecting to the grant of a planning permit, with notes about the relevant policy, rules and guidelines

Category	Notes
Process	<p>The <i>Victoria Planning Provisions (clause 55)</i> http://planningschemes.dpcd.vic.gov.au/schemes/vpps <i>Darebin Planning Scheme: Municipal Strategic Statement</i> http://planningschemes.dpcd.vic.gov.au/schemes/darebin/ordinance/21_ms01_dare.pdf <i>Darebin Housing Strategy 2013-2033</i> http://www.google.com.au/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=0CB0QFjAA&url=http%3A%2F%2Fwww.darebin.vic.gov.au%2F~%2Fmedia%2Fcityofdarebin%2Ffiles%2FYourCouncil%2FHowCouncilWorks%2FMeetingAgendasMinutes%2FCouncilMeetings%2F2013%2F15Jul%2FItem-83-Appendix-D--Council-Meeting--Amendment-C138.ashx%3Ffla%3Den&ei=94RmVZn2C8HbmAXvmoGACg&usg=AFQjCNE1WGrWYiEBG6jhBg1k-P2fIOlwHg&bvm=bv.93990622,d.dGY <i>Darebin Neighbourhood Character Study 2007</i> http://gis.darebin.org/Planning_Info/Urban_Character/Precinct%20F5.pdf Public notice on property – requirements TBD</p>
Waste management plan	TBD (1)
Amenity for occupants (for neighbours amenity see overlooking and overshadowing)	<p>The <i>Victoria Planning Provisions (clause 55)</i> http://planningschemes.dpcd.vic.gov.au/schemes/vpps Urban Context Report and Design Response (Clause 52.35). The <i>Guidelines for Higher Density Residential Development (DSE 2004)</i> are a statewide planning tool for apartment development of four storeys or above across Victoria. The object of the <i>Building Act 1993</i> and the <i>Building Regulations 2006</i> is to protect the safety and health of people who use buildings. http://www.austlii.edu.au/au/legis/vic/consol_act/ba199391/ LPPF 54.05, 55.05 http://planningschemes.dpcd.vic.gov.au/schemes/vpps <i>NSW State Environment Planning Policy 65</i></p>

	<p>– <i>Design Quality of Residential Flat Development</i> (SEPP 65) http://www.planning.nsw.gov.au/residential-flat-design-code <i>Better Apartments Discussion Paper May 2015</i> http://delwp.vic.gov.au/_data/assets/pdf_file/0015/301542/Better-Apartments-Discussion-Paper-FINAL-ONLINE-version.pdf</p>
Landscaping and vegetation	<p>The <i>Victoria Planning Provisions (clause 55)</i> <i>Planning & Environment Act 1987</i> 93.06 (significant trees – sadly not recognised in Darebin) More is TBD</p>
Neighbourhood character and heritage	<p>The <i>Victoria Planning Provisions (clause 55)</i> TBD (2)</p>
Traffic and parking	<p>Parking spaces requirements– LPPF 52.06 Reduction of parking requirements, see 93.10 For consequences of waiver see Vic road rules 167, 168, 170, 176, 196, 197, 198</p>
Pedestrian safety	<p>Vic road rules 170-5, 179, 183, 187, 189, 195, 196, 197, 198, 203</p>
Loading bay for mixed use residential and commercial	<p>LPPF 52.07, 93.11 Vic road rules define a loading zone</p>
Environmental sustainability design	<p>TBD (3)</p>
Overlooking	<p>LPPF 54.04</p>
Overshadowing	<p>LPPF 54.04</p>
Density and scale	<p>TBD (4)</p>
Building services (5) (not shown on plans)	<p>TBD</p>
OTHER	<p>EPA info about residential noise here: http://www.epa.vic.gov.au/your-environment/noise/residential-noise</p>

Footnotes

TBD = to be determined

LPPF = local planning and policy frame work, available here;

<http://planningschemes.dpcd.vic.gov.au/schemes/vpps>

Vic road rules = Victorian Road Safety Road Rules 2009,

<https://www.vicroads.vic.gov.au/safety-and-road-rules/road-rules/a-to-z-of-road-rules>

[http://www.legislation.vic.gov.au/Domino/Web_Notes/LDMS/LTObject_Store/LTObjSt5.nsf/DDE300B846EED9C7C-A257616000A3571/A1EA37D8E6E0E200CA257761003FFBF/\\$FILE/09-94sr003.pdf](http://www.legislation.vic.gov.au/Domino/Web_Notes/LDMS/LTObject_Store/LTObjSt5.nsf/DDE300B846EED9C7C-A257616000A3571/A1EA37D8E6E0E200CA257761003FFBF/$FILE/09-94sr003.pdf)

(1-5) additional relevant comments that are too long for the small box

(5) building services are defined as the utility meters, fire service for apartments etc.

http://gis.darebin.org/Planning_Info/Urban_Character/Precinct%20F5.pdf