



Attention: Mr S. Fedorow, Acting General Manager

**DA/1202/2017 101-103 Wongala Crescent, Beecroft**

The Beecroft Cheltenham Civic Trust objects to DA1202/2017 in regard to the proposed subdivision 101-103 Wongala Crescent, Beecroft. The Trust apologises for the late objection.

The proposed new lot is subject to severe flooding and a new lot with any development is considered to be a risk. The extensive flood study attached to the DA indicates that the critical section of the lot where people will be living and traversing, is the section most vulnerable to flooding.

The proposed driveway onto Wongala Crescent is located at the lowest position in the street. The driveway is lower than the existing stormwater pipes that are under the road, draining the catchment upstream. This proposal creates a scenario for a disaster to occur as it only requires the existing stormwater drain to become blocked by debris and the new lot will become isolated from the road due to overland flooding. The Trust is aware there has been past flooding due to blockages in the past.

The width of the proposed lot being only 13.5 metres is significantly less than the minimum requirement of 15 metres stated in Council's planning controls. The narrow lot, combined with the flooding problems, will create a lot that would not satisfy the intent of council's planning controls.

The applicant is not proposing a dwelling at this stage, stating the concerns in the Heritage report regarding impacts on the area's heritage character "shall be subject to a separate approval at which time Council

can ensure the character of the conservation area is to be maintained". However, once subdivision is approved, a dwelling will be allowed despite potential unavoidable impacts. This issue needs to be noted as at the subdivision stage especially with the creation of such a narrow, constrained site.

In summary, this proposed subdivision is not in the public interest under section 79c of the EPAA. The Trust is also concerned that the flooding risks will compromise Council's exposure to potential litigious actions in the future should serious flooding occur. It is essential that these potential risks are fully addressed at the subdivision stage before a legal lot is created. The Trust believes this DA should be refused.

Janet Hayes  
Vice President  
Beecroft Cheltenham Civic Trust  
23 December 2017