

Submission:	Support, oppose or general comments:	Comments:
1	Oppose	<p><i>The current proposal does not provide for adequate vehicular access to the types of future low-impact urban-infill subdivisional developments to which this policy amendment is to be imposed upon.</i></p> <p><i>This policy amendment if implemented effectively creates a double standard given the current levels of existing (and successful) low-impact urban infill already in the ToVP. That is to say that there are already a high occurrences of dual crossover (or multiple crossover) subdivisions within the ToVP which are functional, safe and well-integrated into the surrounding local streetscapes. Additionally, this would also seek to discourage simpler battle-axe type subdivisions as it effectively compels any such future subdivisions to have a common shared vehicular access. Similarly, the amendment would equally disincentivise any "duplex" type subdivisions as it proposes to also have narrowed and shared driveways in that type of subdivision format also.</i></p> <p><i>The policy amendment does not account for the realities of how common driveways are actually utilised in a strata arrangement wherein the inherent geometry and accessway requirements heavily favour the rear strata incumbents with regards to vehicular parking potential where the "deemed to comply" driveway arrangements are implemented as per the R-Codes.</i></p> <p><i>To this effect this policy cannot be pragmatic for dwelling occupants without being paired without necessitating a requirement for dedicated "visitor" parking bays – a requirement which is otherwise cumbersome to small strata type subdivisions involving ≤4 dwellings of a detached or semi-detached nature.</i></p> <p><i>The ToVP's statement on the matter of prioritising on-street parking is not backed up in recent examples of town works – in particular the substantial reduction in Parking capacity on Rutland Avenue – hence demonstrating inconsistencies in ToVP policy statements vs. ToVP actual on-ground development project practices.</i></p> <p><i>For these reasons and as both a resident and ratepayer of within the ToVP – I do not support this change to the planning policy.</i></p>

2	Oppose	<i>Draft policy has merit, but not a blanket approach. If lot size allows but can't due to pos/design of exist. front house, then this house is lost or development is stopped.</i>
3	Oppose	<p><i>The following objection is raised to the draft policy which in summary, is as follows:</i></p> <ul style="list-style-type: none"> <li><i>• The draft policy seeks to amend the deemed-to-comply criteria of the R-Codes by adding additional criteria, despite assertions otherwise;</i></li> <li><i>• To be correctly adopted, the Town should seek WAPC approval;</i></li> <li><i>• The scope of instances where the Town may exercise discretion and approval additional access points is insufficient and should be expanded.</i></li> </ul> <p><u><i>Amending the deemed-to-comply</i></u>  <i>The draft policy and accompanying officers report makes clear that the purpose of the policy is not to amend the deemed-to-comply criteria of the R-Codes - and this is expressly not permitted by the R-Codes in any event.</i></p> <p><i>Part 7.1 of the R-Codes states:</i>  <i>7.1 The decision maker shall not amend or modify the R-Codes Volume 1, provide for greater or lesser requirements unless it relates to matters expressly permitted under the R-Codes Volume 1 to be amended or modified.</i></p> <p><i>Design element 5.1 of the R-Codes provides the criteria for the assessment of vehicle access, including the following deemed-to-comply criteria:</i></p> <p><i>C5.1 Access to on-site car parking spaces to be provided:</i></p> <ul style="list-style-type: none"> <li><i>• Where available, from a right-of-way available for lawful use to access the relevant lot and which is adequately paved and drained from the property boundary to a constructed street; [Underline added]</i></li> </ul> <p><i>Advice received from the Town assumes that 'right-of-way' can relate to common property. This is correct, but not in the context of C5.1. The use of the balded term 'lot' refers to the parent lot, in which common property would not serve; while the rest of the</i></p>

		<p><i>clause (underlined) clearly refers to situations where a ROW, external to the lot, serves the land.</i></p> <p><i>Of further note is C5.2:</i></p> <p><i>C5.2 Driveways to primary or secondary street provided as follows:</i></p> <ul style="list-style-type: none"><li><i>• no driveway wider than 8m at the street boundary and driveways in aggregate no greater than 9m for anyone property.</i></li></ul> <p><i>Vehicle access is not one of the criteria permitted to be modified. Despite assertions that the draft policy does not modify the R-Codes, it clearly provides less and/or more stringent criteria than the existing deemed-to-comply criteria by attempting to further limit the location, number and design of vehicle access points. The draft policy even contemplates situations where 'more than one vehicle access' point might be contemplated. This is clearly beyond 'clarifying the deemed-to-comply' given the deemed-to-comply relate only to the street hierarchy and the width of access points at the street.</i></p> <p><i>The draft policy, at Figure 2 depicts a situation where independent crossovers to a site would not be supported. In this instance, no right-of-way is available so access to each dwelling must be obtained from the primary street. Of course, a landowner may choose to have this access combined/shared, however separate access points to the primary street would meet the deemed-to-comply criteria if individually less than 6.0m and in aggregate less than 9.0m.</i></p> <p><i>In this instance the draft policy would be enforcing a situation that is clearly a greater requirement than the deemed-to-comply. in those instances, the draft policy has no affect as it would not have been correctly adopted.</i></p> <p><i>A number of local planning policies have attempted to address this matter - most recently in the City of Fremantle and City of Nedlands. In both instances, the policies</i></p>
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4	Oppose	<i>This should simply be a guideline &amp; not enforceable. Every circumstance is different and when council tries to come up with broad policies which cannot possibly address every individual circumstance, it creates unnecessary anxiety through the red tape</i>
5	Oppose	<i>Will council offer compensation or exemptions. Some existing houses on lots with large development potential will not be able to have a small house behind house, this is a push towards bigger developments &amp; more carparking needs.  Unfair targeting of some property owners, that others have benefited from. It causes a loss of small development potential.</i>
6	Oppose	<i>This diminishes amenity for residents by forcing them to share crossovers when they may not have to. This could cause conflict between neighbours and discourages high-quality, infill development.</i>
7	Oppose	<i>This is a disincentive to positive urban infill outcomes. Occupant amenity is poor from a shared crossover. It devalues properties and causes conflict between neighbours. I have been violently threatened due to blocking vehicles in joint crossover</i>
8	Oppose	<i>On-street parking should be discouraged as it creates an unsafe risk to pedestrians and passing vehicles due to reduced sight lines and shared use of the roadway. It is visually detrimental to streetscapes and causes conflict between neighbours.</i>

9	Oppose	<i>The policy is too restrictive and too prescriptive. Where there are 2 or more green-title blocks created through a subdivision each block should have its own street entry. It is too overly-prescriptive on driveway construction materials</i>
10	Oppose	<p><i>I believe the policy is unnecessarily restrictive and prescriptive in nature. The driveway access with respect to duplex developments will result in an unnecessarily stressful life for residents living in a duplex. What if one resident parks in the driveway? Why give up the opportunity for residents to be able to have guests park in their driveway? In relation to the restriction shown in Figure 2, I believe this overly restricts design of the front home and reduces liveability. Rather than having vehicle access from the front of the lot as in a typical front lot, the design will restrict vehicle access to the rear of the property which reduces back yard size. This means that the resident living in the home will have a back yard half the size and a front yard double the size which is the opposite to what a family with children would prefer.</i></p> <p><i>In general I also believe the policy is too short sighted and will restrict development and liveability as a result. The images suggest that the Town would want to plant 2 trees on a verge rather than 1. While I understand that planting 2 smaller trees on a verge will provide faster coverage, it will also restrict the ability for people to park their car on the verge, leading to more vehicles being parked on the street. If the Town would plant 1 tree on each verge that would then grow larger, you would end up with the same shade coverage, without restricting people using the verge for other purposes.</i></p> <p><i>Tree coverage and shade provision is a long term game, not a short one.</i></p>
11	Oppose	<i>Front property should always have its own crossover/driveway and does not share with others. Common driveway and crossover will be required for future subdivision.</i>
12	Oppose	<i>Front property is good to have its own crossover/driveway and doesn't share with others. Minimum of two crossovers are critical for subdivision development.</i>
13	Oppose	<i>Policy will result in reduced # of single residential houses addressing street. Reduced passive surveillance. Visitor parking on driveways lost encouraging street parking (reduced visibility, visual clutter &amp; risk to pedestrians) Less 'ownership' of verges</i>

14	Oppose	<i>I don't believe the side by side arrangement having a shared driveway is practical or aesthetically positive. It will add more cars to park on the road and does not consider the best usage of the land to build a sustainable house as its defined by the garage.</i>
15	Oppose	<i>Shared driveways are not in the best interest of anyone, as they never get maintained. Because everyone thing everyone should do it. They just cause legal disputes and what detrimental affect does 2 crossovers have to the town of victoria park.</i>
16	General comment	<i>A more expansive suggested, to supplement the online response, for your kind consideration as follows Item 1.3 ii: It might be suggested that the term 'demonstrated need' is somewhat ambiguous and therefore options might be either: retain since subjective interpretation allows stakeholder flexibility; or, revise with more definite value-based criteria that cross-references the subsequent items more explicitly. Item 4c: Overall perhaps the document needs to clarify the extent to which it applies to: predominately new developments/ new developments' application alone; or, new developments and relatedly new refurbishment/renovations; or, new development and also refurbishment/renovations and also retrospective action irrespective of new developments' applications/associations.</i>
17	General comment	<i>Because of the high density flats in my street, I am concerned that the draft policy will adversely impact on my driveway access. I feel that consideration should be given to paved verge parking</i>
18	Support	<i>Driveways alongside one another to adjoining properties should not be permitted coalescence to form an unattractive expanse of hard surface. Crossovers should be separated by an island/area to encourage vegetation. Example: 57 B/C and 53 (55) Swansea St.</i>