



IMAGINE  
THE YARRA

# DRAFT YARRA STRATEGIC PLAN

## PUBLIC CONSULTATION

### SUBMISSION COVER SHEET

<b>Submission Number:</b>	YSP31
<b>Name (Individual/Organisation):</b>	Kellehers Pty Ltd on behalf of Santa Lucia Pty Ltd
<b>Attachments:</b>	Attachment 1 – Written submission

29 March 2020  
Our ref: KA/YSP

The Hon Lisa Neville MP  
Minister for Water  
and  
The Hon Richard Wynne MP  
Minister for Planning  
c/-Engage.Vic.Gov.Au

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Dear Ministers

**Re: Community Consultation: draft Yarra Strategic Plan**

We act on behalf of Mr Adrian Moore and, on his behalf, thank you for the opportunity to comment on the draft Yarra Strategic Plan (YSP).

Our client is the Chairman of Santa Lucia Pty Ltd, the registered proprietor of the property located at 2-4 Riversdale Road Hawthorn (SLProperty). [REDACTED] and owns the majority of apartments within those buildings. They are located within an 'urban area' within the 'inner city' catchment as identified in the YSP.

Our client supports the YSP in its identification of key threats to river health and commends its community vision. He agrees with the YSP identifying that planning controls should seek to protect those values and ensure that any development respects the Yarra River and its environs and that a lack of consistently applied planning controls throughout the River's varied reaches, and across municipalities, will undermine the ability of the YSP to achieve the community's long term vision and contribute to poor long term outcomes, which threaten the river's significant value. However, given there is already a very varied urban landscape along these environs, our client is concerned to have further detail as to how these values are anticipated to be successfully achieved.

Particularly, he notes YSP references to the significant drop in rainfall entering the river as a result of climate change. The SLProperty is affected by a Land Subject to Inundation Overlay. Given identified changes to the River level, the LSIO will, in due course, be necessarily changed to reflect the changed water levels, unless there is radical action that reverses the impacts of climate change. It is important that the potential for such amendment be identified as a factor for consideration, and full consideration given to the impact this may have on increased urban development within the existing LSIO that will no longer be at risk of flood inundation - and, particularly, any proposed development within the area affected by such change.

On behalf of our client, we seek further information regarding the proposed refining of permanent design and development and landscape management controls between Richmond and Warrandyte which continue to prescribe mandatory and maximum building heights, minimum development setbacks and overshadowing controls, and strengthened vegetation controls for all new development. The SLProperty is already subject to a Design and Development Overlay (DDO31-B) pursuant to the provisions of the Boroondara Planning Scheme. We seek clarity as to whether the existing provisions are likely to change.



Similarly, the SLProperty is affected by a Heritage Overlay, which may or may not be altered within the proposed YSP and its elements of Indigenous and landscape heritage significance.

Our client would also be interested to learn more regarding the proposal that development must also be set back from adjoining parklands and conservation areas to maintain views.

Our client seeks an opportunity to be heard.

Yours faithfully



**KELLEHERS AUSTRALIA**

LK/lm

