

**STATEMENT OF GROUNDS BY FRIENDS OF THE GLENFERN GREEN WEDGE INC**  
**607-621 Burwood Highway, Ferntree Gully**

**P138/2023 Application for subdivision**

The Friends of the Glenfern Green Wedge objects to the proposed subdivision at 607-621 Burwood Highway on the following grounds:

1. The high ecological value of this site will be destroyed (with flora and fauna that is protected at federal, state and local planning levels). This includes at least 2 Endangered Ecological Vegetation Classes (918 and 937) under the federal EPBC Act. Also, there are at least 49 indigenous plant taxa (with 9 listed as Rare or Threatened in Victoria); 50 indigenous terrestrial vertebrate species; and 15 species of wetland birds. This proposal obliterates endangered and intact biodiverse ecosystems that currently exist on site.
2. The proposed subdivision is inconsistent with planning policy framework. For example, Under Clause 37.02-2 of the CDZ, the responsible authority must still consider the Municipal Planning Strategy and Planning Policy Framework as well as requirements in the schedule to the zone. The proposal is contrary to this.
3. The planning documents make false claims, such as that 'existing biodiversity is conserved'. It also makes false claims that the existing lake cannot be repaired and made safe. Their own expert reports testify that it can be made safe.
4. The proposal does not include sufficient open space.
5. The proposal is overdeveloped and poorly serviced including a lack of public transport.
6. The information in the proposal is manifestly incomplete and inadequate with no information provided on the Mixed--Use Zone or the majority of the development on site. On this basis, they are requesting that the entire subdivision be approved.
7. Social housing is not directly provided on the site and is not guaranteed. The development is aimed at high income earners and ignores the desperate need for social housing and low-income housing and rental accommodation in the area. This is contrary to State Government and local government policy.
8. In the applicant's expert report on the ecology of the site, conducted by (originally conducted by Ecocentric, March 2021), they have deleted critical ecological data relating to the site. They have done this on the pretext that the data does not apply to the entire site. However, the report itself states clearly that it does apply to the entire site.
9. The drainage stormwater system poses a threat to the health of Blind Creek and potential flooding.
10. The proposal treats 'offsets' as the first course of action. However, these should only be used as a last resort and are not appropriate at all in this case when such a high-quality intact ecosystem and endangered species are involved.
11. The proposal is a poor response to climate change and sustainability values.