

VIEW SHARING ANALYSIS

Response to Request for Further Information – Item 2

75 The Esplanade, Portarlington VIC 3223

Lot 4 on LP110553 | Planning Permit Application PP-672-2026

Proposal	Construction of a new two-storey dwelling exceeding 7.5 metres in height
Current plan issue	Construction Issue 5 – Revision B, dated 17 August 2026
Maximum overall height	7.907 metres above natural ground level
DDO19 benchmark	7.5 metres above natural ground level
Height exceedance	0.407 metres (407 mm) , approximately 5.4% above the benchmark
Properties specifically identified for assessment	2, 4, 6, 8, 1/15, 17 and 19 Seaforth Drive, Portarlington
Prepared	26 August 2026

Planning response prepared for submission to the City of Greater Geelong in response to the Further Information Request dated 4 August 2026.

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1. EXECUTIVE SUMMARY

The City of Greater Geelong has requested a view impact analysis to assess the proposal against the design objectives of DDO19. Council specifically requires the analysis to demonstrate how the proposal reasonably shares views having regard to **topography, siting, height, visual bulk and available view extent**. The RFI also recommends consideration of the DDO19 decision guidelines.

The revised Construction Issue 5 plans materially clarify the height of the proposed dwelling. The ground floor is set at **2.100 AHD**, the first floor at **5.130 AHD**, and the first-floor pitching plate at **7.720 AHD**. The maximum overall building height is approximately **7.907 metres above natural ground level**.

Accordingly, the proposal exceeds the 7.5 metre DDO19 trigger by approximately **407 mm**. Critically, that additional height is confined to the upper roof form. It does not represent an additional habitable storey or a corresponding increase in the first-floor level. The principal habitable levels remain at 2.100 AHD and 5.130 AHD, with the roof form rising above the 7.720 AHD pitching plate.

The photographic and aerial evidence supplied for the seven identified properties indicates that the surrounding Seaforth Drive dwellings are predominantly single-storey. The supplied evidence identifies **8 Seaforth Drive** as the principal property requiring specific consideration because it is the only identified dwelling with an apparent two-storey form and an elevated coastal outlook in the material provided.

On the evidence available, the proposed development is considered to provide a **reasonable sharing of views**. The potential effect on 8 Seaforth Drive is acknowledged rather than dismissed; however, the incremental effect arising from the small portion of roof above 7.5 metres is considered limited when viewed in the context of the dwelling's siting, articulated roof form, existing surrounding development and the extent of the existing outlook.

Overall finding: the proposal is not considered to unreasonably compromise significant coastal views from the identified properties and is considered consistent with the view-sharing intent of DDO19.

2. PLANNING FRAMEWORK

The City's RFI identifies the proposal as a dwelling greater than 7.5 metres and specifically requires a view impact analysis against DDO19. The RFI states that the analysis must consider topography, siting, height, visual bulk and available view extent.

The Portarlington Structure Plan identifies DDO19 as the overlay applying to residential coastal frontages and states that it guides development along the foreshore to ensure there is opportunity for view sharing and that development is consistent with the spacing and setting of dwellings and the coastal theme of the area.

The Greater Geelong planning framework also identifies the strategic direction for Portarlington as providing **reasonable sharing of views of the coast and foreshore where a view has been identified in an overlay**, together with contemporary design that reflects the existing scale, setbacks, spacing, forms and materials of buildings in the locality.

A City of Greater Geelong planning report addressing DDO19 describes the relevant decision guideline as requiring the design and siting of buildings exceeding 7.5 metres to allow for reasonable sharing of views having regard to the **extent of available views and their significance from affected properties**.

For this application, the assessment therefore does not treat the 7.5 metre figure as a simple measure of view loss. The relevant question is whether the design and siting of the dwelling, including the limited roof height above 7.5 metres, unreasonably diminishes a significant coastal view from an affected property.

2.1 Floodplain context

The Council's Civil Infrastructure advice identifies the applicable flood level as 1.80m AHD and requires a minimum 300mm freeboard, resulting in a minimum finished floor level of **2.10m AHD** for the dwelling. The revised plans adopt the 2.100 AHD ground floor level. The referral response also notes that the proposed eastern setback assists the passage of overland flows.

The required flood-resilient floor level is therefore an important site constraint when considering alternative designs. The additional roof height should not be viewed in isolation from the need to establish the dwelling at the floodplain-mandated level.

3. PROPOSED DEVELOPMENT AND HEIGHT

The revised Construction Issue 5 drawing set is identified as Revision B dated 17 August 2026. The drawing list includes the site plan, shadow diagrams, ground and first floor plans, roof plan, sections and building elevations.

Element	Level / measurement	Planning significance
Natural ground / pad level	Approximately 1.650 AHD	Reference level shown on the revised sections/elevations
Ground floor	2.100 AHD	Matches the floodplain manager's required minimum FFL
First floor	5.130 AHD	Habitable first-floor level; well below the maximum roof height
First-floor pitching plate	7.720 AHD	Roof structure begins above this level
Maximum overall height	7.907m above NGL	Approximately 407mm above the 7.5m DDO19 benchmark

The revised southern and eastern elevations show the roof form above the 7.720 AHD pitching plate, with roof pitches of approximately 10°, 15° and 22.5°. The roof is therefore articulated rather than presenting as a uniform full-width wall at the maximum height.

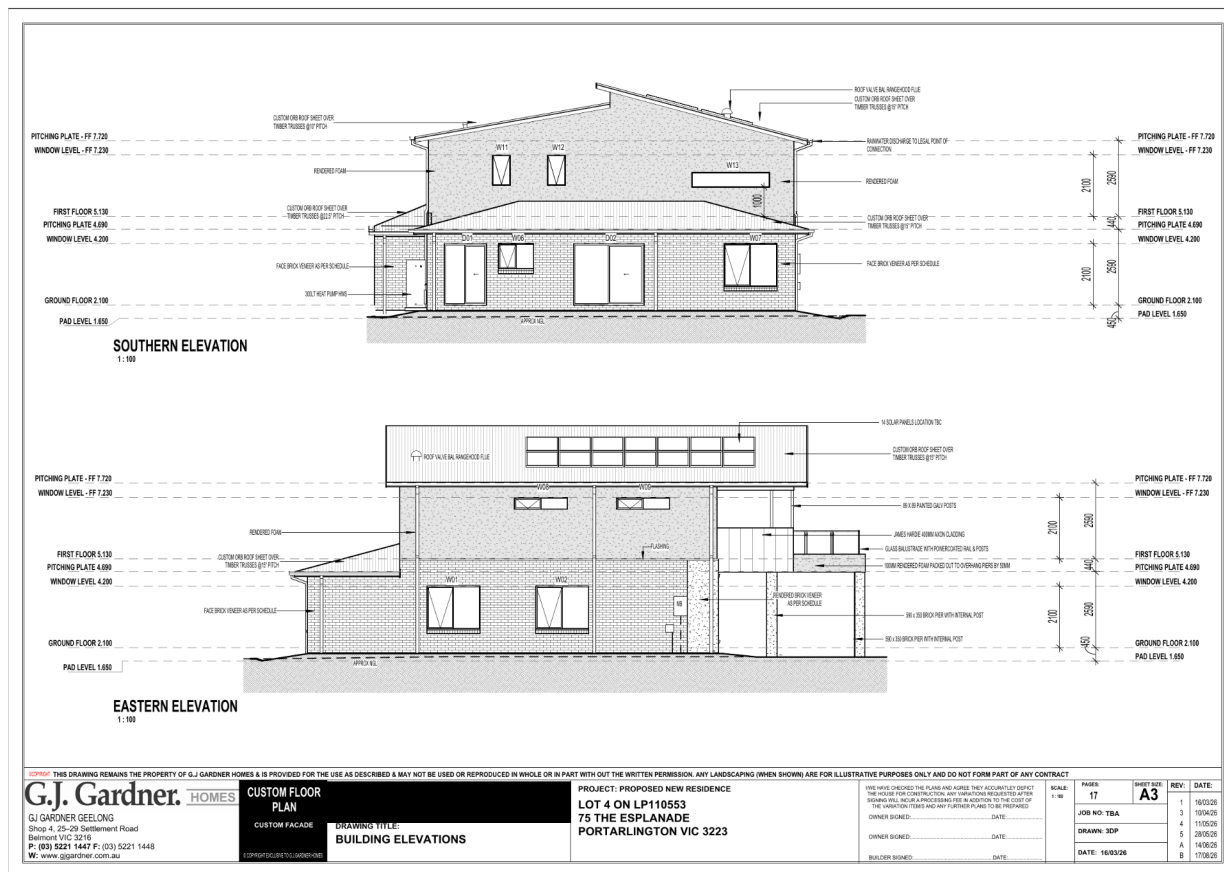


Figure 1 – Revised Construction Issue 5 building elevations (sheet 17).

4. SITE CONTEXT AND ASSESSMENT METHODOLOGY

The assessment has been undertaken using the revised architectural plans, Council's RFI and floodplain advice, the supplied aerial photograph and the supplied streetscape/property photographs. The purpose is to identify whether the proposed dwelling is likely to unreasonably diminish a significant coastal view from the properties nominated by Council.



Figure 2 – Supplied aerial context photograph with indicative markers added to identify the subject site and clearly identifiable nominated properties. Marker locations are indicative only and are not a cadastral survey.

Assessment approach

Each nominated property has been considered having regard to: (1) the apparent scale and form of the existing dwelling; (2) whether an elevated viewing opportunity is evident in the supplied material; (3) the likely direction of any coastal outlook; (4) the relationship of the property to the subject site; (5) the proposed dwelling's maximum height and roof form; and (6) whether any identified impact is likely to be material to a significant established coastal view.

Evidence limitation

The supplied photographs are streetscape and contextual photographs and do not constitute a measured survey of private outlooks from every room or balcony. Accordingly, the report avoids claiming a precise percentage of view loss. Where an absence of an elevated coastal outlook is described, this is expressed as an observation from the available evidence rather than as a certification of what may be visible from inside a dwelling.

5.1 2 SEAFORTH DRIVE

Existing context	The supplied photographs show a predominantly single-storey dwelling with a low pitched roof and no apparent upper-level living area or balcony. The associated streetscape photograph does not identify an established elevated coastal outlook from the property.
View impact	Very low / negligible
Assessment	No significant established elevated coastal outlook is evident in the supplied material. The proposed dwelling is therefore unlikely to materially diminish a significant coastal view from this property.



2 Seaforth Drive – supplied dwelling photograph



2 Seaforth Drive – supplied streetscape/view context photograph

5.2 4 SEAFORTH DRIVE

Existing context	The property presents as a single-storey brick dwelling. The supplied streetscape imagery shows surrounding low-scale development, fencing and vegetation. No elevated viewing platform or established upper-level coastal outlook is evident in the supplied material.
View impact	Very low / negligible
Assessment	The evidence does not identify a significant elevated coastal view from the property that would be materially affected by the proposal.



4 Seaforth Drive – supplied dwelling photograph



4 Seaforth Drive – supplied streetscape/view context photograph

5.3 6 SEAFORTH DRIVE

Existing context	The supplied imagery shows a single-storey dwelling and established garden/vegetation. The associated view photograph is consistent with a low-scale streetscape and does not identify an upper-level coastal viewing area.
View impact	Very low / negligible
Assessment	No significant established elevated coastal outlook is evident in the supplied material. Any visual effect of the proposed dwelling is therefore expected to be limited in view-sharing terms.



6 Seaforth Drive – supplied dwelling photograph



6 Seaforth Drive – supplied streetscape/view context photograph

6. 8 SEAFORTH DRIVE – PRINCIPAL VIEW CONSIDERATION

8 Seaforth Drive is the principal property requiring detailed consideration in this analysis. The supplied material shows a two-storey dwelling and, importantly, a photograph from the property context that indicates an elevated outlook toward an open coastal horizon beyond the intervening fencing and development.

Existing form	Two-storey dwelling with an elevated upper-level outlook evident in the supplied imagery.
Potentially affected view	An established elevated coastal/foreshore outlook is apparent from the supplied view photograph.
Potential effect	Limited incremental change to the lower portion of the outlook may occur, depending on the precise internal viewing position. The evidence does not support a conclusion of complete or substantial loss of the coastal outlook.
Why the effect is limited	The proposal's maximum height is 7.907m, only 407mm above the 7.5m benchmark, and the exceedance occurs within the roof form above the 7.720m pitching plate. The habitable first-floor level remains at 5.130m.
View-sharing conclusion	Low / limited incremental impact. The proposal is considered to maintain a reasonable sharing of the available coastal outlook.



8 Seaforth Drive – supplied dwelling photograph



8 Seaforth Drive – supplied view photograph showing open coastal outlook

The relevant planning assessment is therefore not that 8 Seaforth Drive has no view, but that the identified view is capable of being reasonably shared because the proposed height variation is small, roof-specific and does not introduce an additional habitable level above the approved/required floor levels.

7. OTHER IDENTIFIED PROPERTIES

7.1 1/15 Seaforth Drive

The supplied photograph shows a low-scale, single-storey dwelling and driveway setting. No upper-level living area or elevated coastal viewing platform is evident in the supplied material. The property is therefore not identified as having a significant established elevated coastal outlook likely to be materially affected by the proposal.



Figure 5 – 1/15 Seaforth Drive, supplied photograph.

7.2 17 Seaforth Drive

The supplied photograph shows a single-storey brick dwelling. The aerial and streetscape evidence indicate an established low-scale residential setting. No significant elevated coastal outlook is evident in the supplied material.



Figure 6 – 17 Seaforth Drive, supplied photograph.

7.3 19 Seaforth Drive

No dedicated street-level photograph of 19 Seaforth Drive was supplied. The assessment for this property is therefore necessarily more limited. Based on the supplied aerial/context material, no clearly identifiable elevated viewing platform or upper-storey coastal outlook has been established for the property. This report does not claim that no private view exists; rather, there is insufficient supplied evidence to identify a significant elevated view that would be materially affected.

Assessment: Low / limited potential impact, subject to the evidentiary limitation above.

8. PROPERTY-BY-PROPERTY SUMMARY

Property	Existing form / evidence	View significance evident in supplied material	Likely impact
2 Seaforth Drive	Single storey; no elevated viewing area evident	No significant elevated coastal outlook identified	Very low
4 Seaforth Drive	Single storey; low-scale streetscape	No significant elevated coastal outlook identified	Very low
6 Seaforth Drive	Single storey; garden/vegetation	No significant elevated coastal outlook identified	Very low
8 Seaforth Drive	Two storey; elevated outlook shown	Coastal horizon/outlook evident	Low / limited
1/15 Seaforth Drive	Single storey; low-scale dwelling	No significant elevated coastal outlook identified	Very low
17 Seaforth Drive	Single storey; low-scale dwelling	No significant elevated coastal outlook identified	Very low
19 Seaforth Drive	No dedicated photo supplied; aerial/context only	No significant elevated outlook established from supplied evidence	Low / limited

The assessment demonstrates that the view-sharing issue is concentrated on **8 Seaforth Drive**. The other identified properties are predominantly single-storey and the supplied material does not identify established elevated coastal views from those properties.

This concentration of the potential impact is relevant to the DDO19 decision-making framework, which requires regard to be had to the extent and significance of available views from affected properties.

9. RESPONSE TO DDO19 VIEW-SHARING CONSIDERATIONS

Consideration	Response to proposal
Topography	The supplied site information indicates a relatively flat subject property, with the principal vertical response driven by the required floor level. The principal vertical manager requires the dwelling FFL to be no lower than 2.10 AHD.
Siting	The dwelling is positioned within an established residential frontage. The revised plans retain the stated frontage of 14.143m, which also assists flood-flow considerations.
Height	The maximum overall height is approximately 7.907m, exceeding the 7.5m benchmark by approximately 407mm. The first floor remains at 5.5m AHD, and the roof level is at 7.720m. The exceedance is therefore confined to the roof form.
Visual bulk	The roof is articulated through differing pitches and is not a uniform wall at the maximum height. The upper form is separated from the main body of the building by a lower roof level and is visually moderated by roof geometry and openings.
Available view extent	The supplied evidence identifies 8 Seaforth Drive as the only nominated property with a clearly demonstrated elevated coastal outlook. The other supplied property photographs show predominantly single-storey dwellings and do not demonstrate equivalent elevated outlooks.
Significance of views	The coastal outlook from 8 Seaforth Drive is acknowledged as significant enough to warrant specific consideration. The analysis does not rely on an assertion that there is no impact; instead, it finds that the incremental effect is limited and does not amount to unreasonable view loss.
Reasonable sharing	On balance, the proposal provides reasonable sharing of available coastal views. The small roof-only height variation does not unreasonably compromise the identified outlook from 8 Seaforth Drive and does not identify a material coastal view loss from the remaining nominated properties.

The planning framework is therefore satisfied not because the building is below the 7.5m trigger—it is not—but because the design and siting, when considered in context, allow a reasonable sharing of the available and significant views identified in the evidence.

10. CONCLUSION

The revised proposal at 75 The Esplanade has been assessed against the view-sharing considerations identified by Council in the RFI and the relevant strategic intent of DDO19.

The revised Construction Issue 5 plans establish a maximum overall height of approximately **7.907 metres above natural ground level**. This is approximately **407mm above the 7.5 metre DDO19 benchmark**. The additional height is confined to the upper roof form above the 7.720m pitching plate; the habitable first-floor level remains at 5.130m.

The need for the dwelling to be established at a 2.100 AHD finished floor level is supported by the Council floodplain manager's advice, which requires a minimum 300mm freeboard above the 1.80m AHD applicable flood level.

The supplied evidence indicates that the nominated Seaforth Drive properties are predominantly occupied by single-storey dwellings. The principal exception is **8 Seaforth Drive**, where the supplied imagery demonstrates an elevated two-storey dwelling and an apparent coastal outlook. That property has therefore been given specific consideration.

For 8 Seaforth Drive, the analysis acknowledges a potential incremental effect but finds that the effect is limited by the nature of the height variation: the additional 407mm occurs only at the upper roof form and does not create an additional habitable level. The proposal therefore does not result in a disproportionate increase in visual bulk relative to the established residential context.

For the remaining nominated properties, the available photographs do not demonstrate significant established elevated coastal outlooks comparable to that identified at 8 Seaforth Drive. The evidence therefore does not support a finding of material view loss from those properties.

Final planning conclusion

Having regard to the topography, siting, height, visual bulk and available view extent, it is considered that the proposed dwelling provides a reasonable sharing of views consistent with the intent of DDO19. The limited roof height above 7.5 metres is not considered to unreasonably compromise significant coastal views from the identified properties.

11. DOCUMENTS AND SOURCES REVIEWED

Application documents supplied for this assessment

- City of Greater Geelong Further Information Letter – Planning Permit Application PP-672-2026, dated 4 August 2026. Council specifically requests the view impact analysis and identifies the matters to be considered.
- G.J. Gardner Homes – Construction Issue 5, Revision B, dated 17 August 2026, including revised site plan, floor plans, sections and building elevations.
- City of Greater Geelong Civil Infrastructure / SBO response for PP-672-2026, including the required 2.10m AHD minimum dwelling FFL.
- Supplied aerial photograph and streetscape photographs for 2, 4, 6, 8, 1/15 and 17 Seaforth Drive, together with the supplied surrounding-site imagery.

External planning references

- City of Greater Geelong, Portarlington Structure Plan (adopted September 2016, amended July 2017). The Structure Plan identifies DDO19 as applying to residential coastal frontages and describes its purpose in relation to view sharing and coastal character.
- Greater Geelong Planning Scheme – Portarlington strategic directions. The strategic framework refers to reasonable sharing of views of the coast and foreshore where a view has been identified in an overlay, and to development reflecting the existing scale, setbacks, spacing, forms and materials of the locality.
- City of Greater Geelong planning report addressing DDO19, which reproduces the relevant view-sharing decision guideline concerning reasonable sharing having regard to the extent and significance of available views.

APPENDIX A – PHOTOGRAPHIC EVIDENCE

The following images are reproduced from the material supplied for this assessment and are included to document the existing streetscape and view context relied upon in the analysis.



2 Seaforth Drive – dwelling



2 Seaforth Drive – streetscape/view context



4 Seaforth Drive – dwelling



4 Seaforth Drive – streetscape/view context



6 Seaforth Drive – dwelling



6 Seaforth Drive – streetscape/view context

APPENDIX A – PHOTOGRAPHIC EVIDENCE (CONTINUED)



8 Seaforth Drive – dwelling



8 Seaforth Drive – elevated coastal outlook



1/15 Seaforth Drive – supplied photograph



17 Seaforth Drive – supplied photograph



Aerial context – supplied aerial with indicative assessment markers

APPENDIX B – REVISED ELEVATIONS

Extract from Construction Issue 5, Revision B (17 August 2026), showing the southern and eastern elevations and the principal levels relied upon in this assessment.

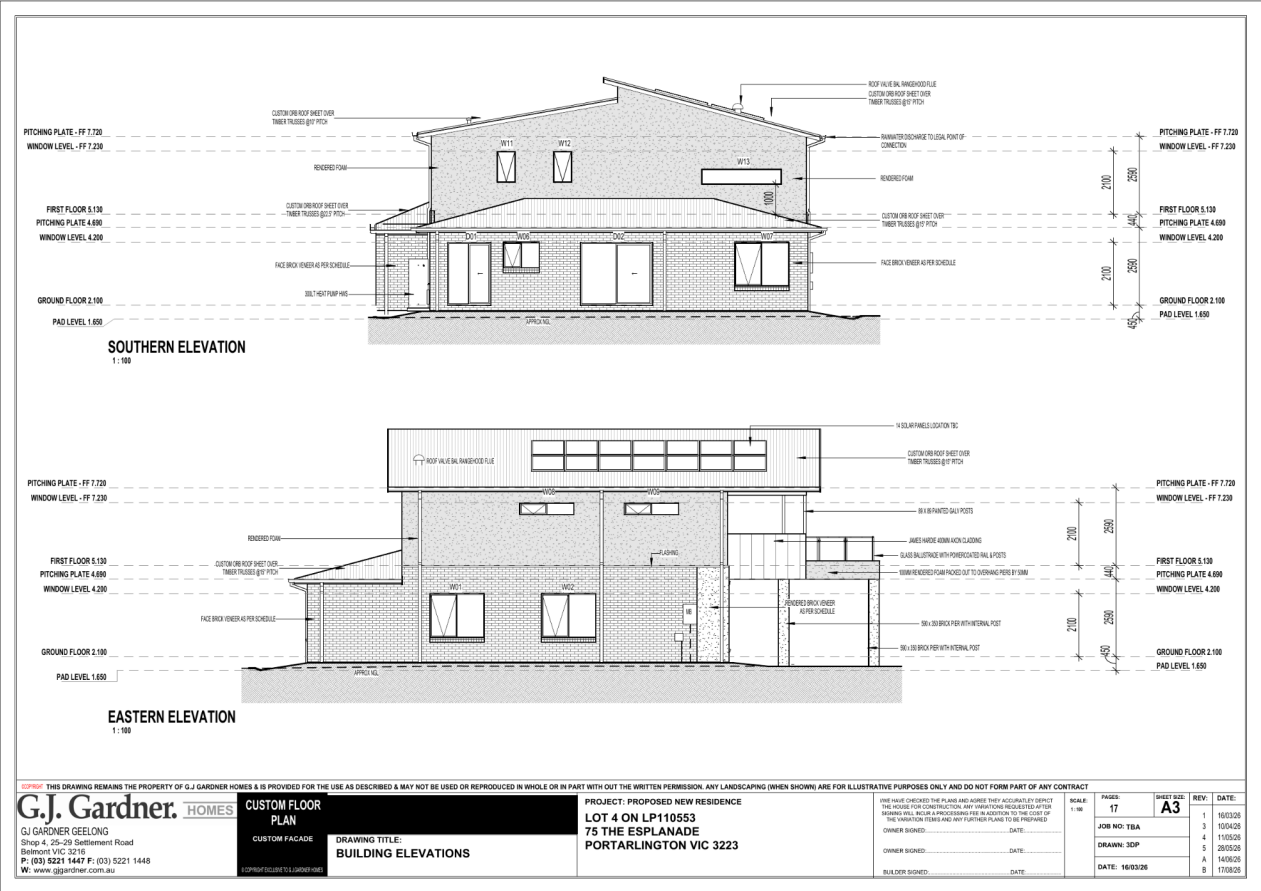


Figure B1 – Building elevations. floor at 2.100 AHD, first floor at 5.130 AHD, window level at 7.230 AHD and pitching plate at 7.720 AHD.

The roof form rises above the 7.720 AHD pitching plate and contains the maximum point of approximately 7.907m above natural ground level used for the view-sharing assessment.