

Peterborough Residents Group Inc.
19 Macs Street, Peterborough Vic 3270
ABN 52 658 1739 39
CAV Registration A0045787 R

30th August 2024

Ms. J. McNamara

Director Environment, Economy & Place

Dear Jodie,

This submission is made on behalf of the Peterborough Residents Group (PRG) following the review of the town planning application and its supporting documents. The PRG considers that the proposal DOES NOT provide a positive design response to the site and surrounds and DOES NOT adequately address all provisions of the Planning Scheme.

Our concerns are outlined further.

Yours Sincerely,

Matthew L. Bowden

Chairman

Peterborough Residents Group

PLANNING

The following is extracted from the Moyne Planning Scheme:

The objectives of the DDO24 are:

- To maintain the existing small scale seaside village character of Peterborough
- To encourage site coverage and provide for separation of buildings that provides space and vistas between buildings.
- To maintain the traditional grid pattern of subdivision whilst encouraging new development of a respectful scale
- To discourage dense streetscapes with a suburban feel and features, including concrete kerbs, channels, and garages.

- To maintain the dominance of the landscape over built form and encourage views from and between dwellings to the surrounding landscape.
- The need for two access points off Old Peterborough Road to allow for emergency access & departure.

NCZ 1 (Central) Objectives are:

- To encourage the retention of an informal coastal ensemble of buildings, occupying small footprints.
- To define central settled areas of town to enhance cohesion and identity of the town.
- Incorporate and enhance the natural and indigenous landscape.
- To support a unique coastal village character in design response and streetscape treatments, discouraging a suburban aesthetic and environment.
- To provide for the incorporation of small-scale commercial accommodation facilities in and around the commercial centre.
- To provide for housing close to business and community facilities appropriate for elderly and special needs persons.
- To encourage environmentally sensitive design approaches, including the control of paved areas for site permeability

The Decision Guidelines (Schedule 24) require:

The following decision guidelines apply to an application for a permit under Clause 43.02, in addition to those specified in Clause 43.02 and elsewhere in the scheme which must be considered, as appropriate, by the responsible authority:

- Whether any subdivision adopts the traditional grid pattern of the street layout.
- Whether there are appropriate setbacks between buildings to provide spaces and views between and from buildings
- Whether the siting and design of buildings and works and subdivision is consistent with the objectives and the strategies of the Residential Design Guidelines, Peterborough, Victoria 2006.
- Whether a building dominates the natural landscape
- Whether the bulk of a building dominates the townscape

PRG Concerns

1. The proposed fifty-eight (58) lot subdivision in the density presented would create adverse impacts on the surrounding land and is inconsistent with the NC1 objective discouraging a suburban aesthetic and environment. It does not provide for cohesion with the town.
2. The bulk, location and appearance of works are not keeping with the character and appearance of adjacent buildings, the streetscape, or the area.
3. The lot sizes less than 700 m² proposed in the multi-lot subdivision are too small, the subdivision should ensure large scale allotments >700 m² consistent with the NCZ1 requirement for lot sizes to exceed 700 m².
4. The proposed landscaping and removal of vegetation, particularly on Old Peterborough Road does not keep with the character and appearance of adjacent buildings, the streetscape nor the area.
5. The subject land is located on the urban periphery of Peterborough, but within the settlement boundary of the town. The urban fringe of Peterborough being the outer fringe of the subdivision should be sympathetic to the town's outer edge and require larger lot sizes, consistent with the properties to the north of Antares Street, which presents the outer fridge of Little Peterborough and town's boundary. Lots 22, 33, 23, and 50 (as a minimum) should be increased in size to 1000 m² lots.
6. Fences should not be erected along Old Peterborough Road. Blocks should be open to Old Peterborough Road to allow an open front to the subdivision.
7. The new residential development will be seen from the surrounds. The existing native vegetation along the roadside and proposed revegetation works within the development through public spaces need to be increased in density and abundance to better integrate the residential development into the coastal landscape setting.
8. The Clause 56 subdivision only "Partly" complies with Cl. 56.04-1 Lot diversity and distribution objectives and Cl. 56.05-1 Integrated urban landscape objectives. The subdivision should comply entirely with the planning scheme.

RESERVES

The Town and Country planning report (planning report) states:

- "The creation of 2 reserves that will have a multi-functional purpose for stormwater filtration, passive public open space areas to serve the subdivision and also enhance biodiversity value for the area by providing additional land to enhance habitat corridors and revegetation."
- "Shared pedestrian connections also provide an extension to habitat corridors to enhance biodiversity values."

The Residential Design Guidelines, Peterborough, Victoria (May 2006) states:

- “**Habitat Corridors** should be developed within all new developments, with the use of indigenous landscape guides defined by Moyne Shire Council.

PRG Concerns

1. The reserves do not provide habitat corridors through the proposed subdivision. According to DCEEW, *wildlife corridors are connections across the landscape that link up areas of habitat. They support natural processes that occur in a healthy environment, including the movement of species to find resources, such as food and water* (<https://www.dcceew.gov.au/environment/biodiversity/conservation/wildlife-corridors#:~:text=Wildlife%20corridors%20are%20connections%20across%20the%20landscape%20that,to%20find%20resources%2C%20such%20as%20food%20and%20water>) There should be continuous connection between Reserve B and A, creating a vegetation link to the east of Old Peterborough Road through to the Antares estate. This will allow adequate movement of habitat from the north and south of Peterborough, connecting Peterborough Coastal Reserve (from Curdies River to Bay of Islands Coastal Reserve). Refer to Figure 1 for preferred corridor.
2. Will Reserve B be open to Old Peterborough Road? There should be linkage to the vegetation on Old Peterborough Road on both the east and west. Reserve B should blend into the roadside vegetation.
3. There is no information to confirm that there is uninhibited access off Old Peterborough Road. This access should not be fenced.
4. It is the intention of the developer to establish the two reserves as public open space and also stormwater retention basins. The planning report indicates the reserves provide 8.95%. The waterbodies in the reserves account for the majority of ‘space’. It is unknown how much of the reserve areas are waterbodies. The allocation of these basins cannot serve the purpose of public open space. It is preferred that a development contribution is established to allow for the upgrade or improvement of other open space in Peterborough, eg. Irvine Reserve.



Figure 7 Aerial Photo of Peterborough surrounding site April 2023

Figure 1 Image depicting natural depressions across the site.

VEGETATION

The planning report states:

- “The proposed native vegetation removal consists of 66m² of existing mixed roadside vegetation that could not be avoided that is necessary to create a new shared vehicle crossover for Lots 1 & 2.”
- “There is no practical opportunity to site the accessways to the relevant lots to avoid the removal of the native vegetation.”

PRG Concerns

1. Vegetation should not be removed from Old Peterborough Road. This vegetation provides a critical link and habitat corridor for movement of wildlife across Old Peterborough Road. There should be no loss of vegetation for the access to lots off Old Peterborough Road.
2. Lots 50 to 52 are to be accessed from Old Peterborough Road. The internal road network for Lots 51 and 52 is not outlined. Further clarity should be provided on the access to Lots 51 and 52.

STORMWATER MANAGEMENT

The planning report states:

- “Calculations on the pre-development and post-development flows for both the minor and major storm events will be given in the Stormwater Management Plan to detail the stormwater runoff as well as the volume of onsite storage required for the minor storm event.”
- “Overall, the land naturally falls from the southwest corner to the northeast, but because of the irregular undulating ground profile there are multiple low points across the site where surface water currently naturally collects onsite, which is contained in those low points and then naturally disperses on site.”

PRG Concerns

1. Figure 2 depicts a previously approved subdivision plan, with interconnected waterways in the subdivision. The proposed 58 lot subdivision should be established with interconnected waterways/Reserves serving as stormwater management and habitat corridors.
2. Currently, stormwater from the Antares estate is piped to this land and there is often standing water. Further detail is required to understand the offsite impacts of stormwater to land north of the subdivision.
3. The mosquito management plan states “The site is generally level, with a gentle north-eastern tilt occurring across the parent lot.” The site is not level, it is undulating. Further information is required on the finished levels of the subdivision, noting there is a significant height difference across the site. The SWMP states “*The site’s approximate high point is located through the southwest corner of the development with a height of 10.46m. Whilst the approximate low point is located in the northeast corner of the development with a height of 4.80m.*”
4. During the PRG meeting with Country to Coast, there was mention of rainwater tanks plumbed to each home. The SWMP does not mention tanks as part of the stormwater management for the subdivision.



Figure 26 Indicative concept for subject land designing around landscape features

Figure 2 Previously proposed subdivision and waterways/habitat corridors.

SINKHOLES/WETLANDS

The Residential Design Guidelines, Peterborough, Victoria (May 2006) states:

“Where possible, subdivision should occur so that numerous properties abut sinkholes, generally at the property’s rear. The sinkhole will act as a natural ‘habitat zone’ encouraging native flora and fauna and will be a shared feature for all properties around it. Existing examples of this can be seen around the town.”

PRG Concerns

1. The planning report refers to the natural sinkholes as “existing natural land depressions”. The depressions have been previously mapped as sinkholes. Further clarity around these depressions should be provided beyond the academic report completed by Federation University (December 2022) a.
2. The PRG recognise that the Federation University report (December 2022) indicates the natural depressions are not associated with underground seawater. The report surveyed three sections that were not aligned with the most depressed

areas of the site, where sinkholes have been identified in previous reports (Figure 3).

3. Whether the natural depressions are sinkholes or wetlands, none the less, these water bodies provide habitat for a range of species, including groundwater dependent ecosystems. Further information is required to understand the importance of these natural surface water bodies and connection with groundwater.
4. Groundwater analysis should occur to confirm the salinity of the groundwater and any seawater intrusion. Further information is also required about the connectivity of the wetlands and sinkholes in the broader area.
5. The geotechnical report (A.S. James 2024) indicates two (2) soft zones in boreholes 1 and 6 at depths of 4.5m and 6.5m respectively and these may be soft zones and *old caverns with water resulting in them being filled in a loose manner with sand*. Further information on these cavities is required.
6. The geotechnical report also recommends that *The logs of the bores should be referred to the author of the resistivity imaging survey (Ander Guinea) for correlation with his results*. It is unknown if this has occurred.



Figure 1: Site of interest at 109 Old Peterborough Road, Peterborough, VIC. The location of the ERI sections is superimposed. The satellite image was obtained with Google Earth (© 2022 TerraMetrics).

Figure 3 Survey transects for 'sinkhole' identification (extract from Federation University 2024)

7. Figure 4 depict the location of 'sinkholes' in the subdivision area. The location of the Reserves is inconsistent with the natural depressions/sinkholes in the subdivision area. The Reserves should align with the natural de to maintain the

ecological integrity, including the groundwater dependent ecosystems that are dependent on the sinkholes.



Neighbourhood Character Zone 1 [NCZ1 - Central]

NCZ1 covers the parts of the town that are seen as becoming the central areas of settlement. These are in 'Old Peterborough', 'Little Peterborough' and along the Great Ocean Road.

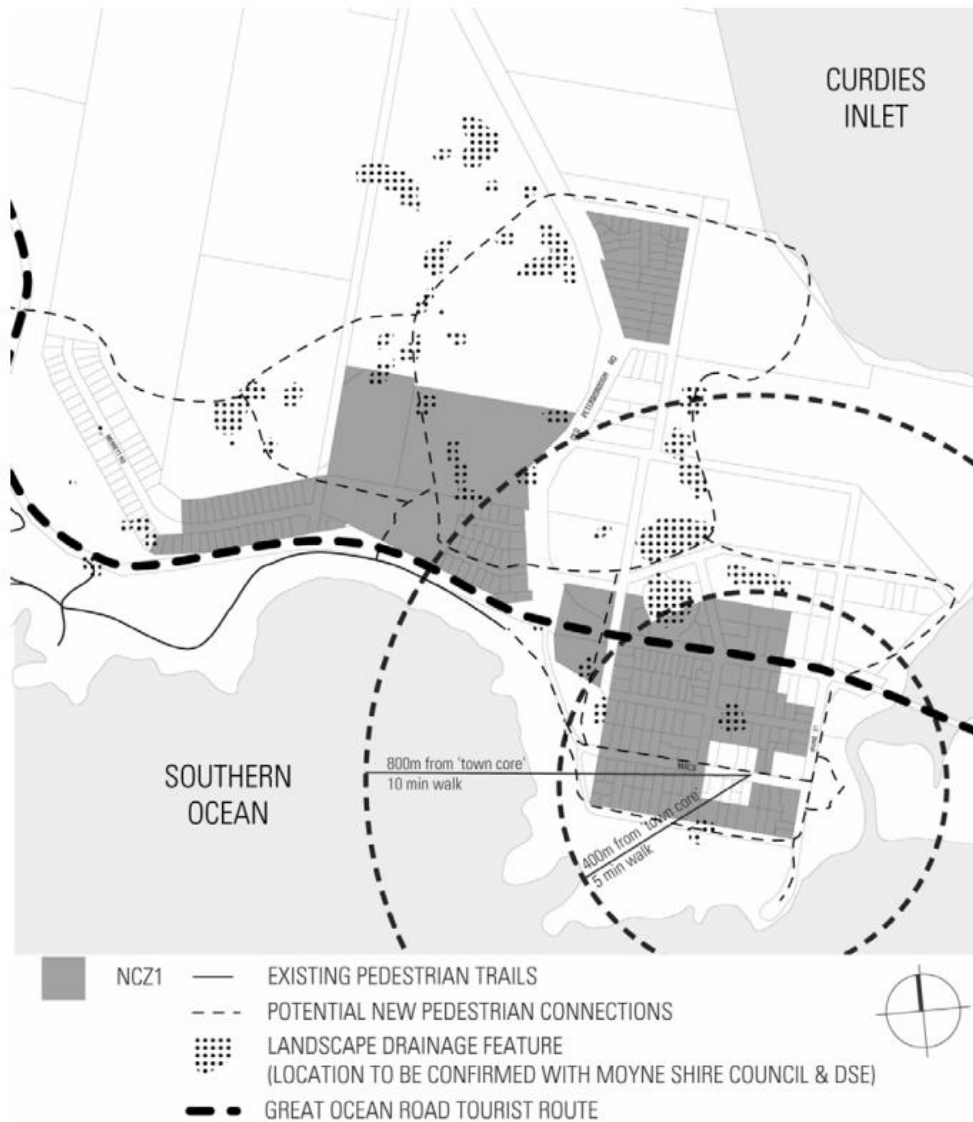


fig 3.2 Neighbourhood Character Zone 1



Figure 4 Location of landscape drainage features in Peterborough (extract from Residential Design Guidelines 2006)

8. Residential Design Guidelines, Peterborough, Victoria (May 2006) depicts a Limestone Sinkhole directly north of Antares Estate. This has not been considered in the 58-lot subdivision.

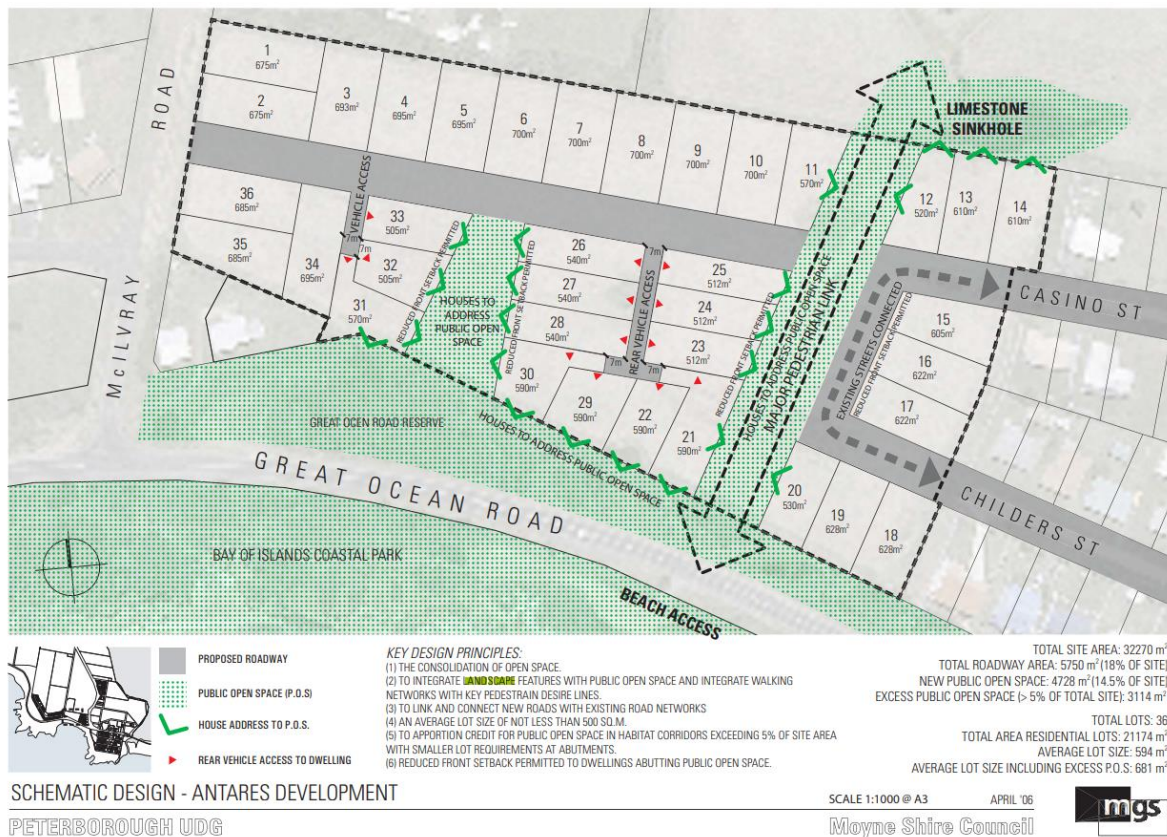


Figure 5 Location of limestone sinkhole (extract from Residential Design Guidelines 2006)

CONSTRUCTION STAGING

The drainage and stormwater management for Stage 1 is not outlined. Further information is required.

GROWTH

The following is stated in the Residential Design Guidelines, Peterborough, Victoria (May 2006):

” Peterborough (Suburb) extends across both the Moynce Shire and Corangamite Shire boundaries. The 2021 Census indicated that in the suburb of Peterborough there is a population of 322 persons, and 359 dwellings, of which 39% were occupied on the night of the census.

In 2016, the census indicated that Peterborough (Suburb) has a population of 247 persons, and 333 dwellings, of which 31.8% were occupied on census night. In contrast in 2006 (Noting the geographic area for the state suburb included only the suburb west of

the Curdies River in the Moyne Shire), the population was 178 persons, with 273 dwellings, of which 45% were occupied on the night of the census.

This data indicates that since 2006 approximately 86 dwellings have been constructed in the Peterborough Area, an average of 5.7 dwellings per year. Peterborough's growth rate is dependent on green fill subdivision, with a low take-up of empty lots within established areas over the last 15 years."

It further states:

"The growth of the township and scale of development, including commercial development, will be limited to ensure the character, serenity and functioning of the township is protected for the enjoyment of permanent and semi-permanent residents and visitors."

"The Planning Panel Report, following the UDF, recommended that the unique urban character of Peterborough justified a town specific set of residential guidelines for future development. These guidelines were to ensure that the modest scale and footprint of built form within the landscape and special coastal setting vernacular were retained. The addition of 150 extra lots was recognised as required in Peterborough. This represents the potential to approximately double the housing stock of 254 in the town, thereby addressing both DSE objectives for facilitating growth and diversity whilst also managing the equally important objective of maintaining an appropriate township character and interface with an environment of high national significance".

PRG CONCERNS

1. The services and commercial offerings in Peterborough cannot accommodate the proposed population growth that would occur with the 58 new dwellings. Further information is required to justify the number of homes and the population increase, in line with the expectations of Moyne Shire Council and the Planning Panel Report.

LANDSCAPING

New Subdivision on 'Greenfield Sites' Objectives:

- To guide new development that reflects the existing character of the town.
- To encourage open and informal streetscapes which reflect the coastal character of the town.
- To connect new developments with the existing street and pedestrian networks of the town.

- To protect natural landscape features through the development of habitat zones and generous public open space networks that serve pedestrian networks.
- To utilize and enhance views towards the agricultural hinterland [north], surrounding estuary [east] and state and national parks.
- To allow informal and open streets, with views from these out into the landscape.
- To maintain the spaces and views between built form in residential streets.

Street and Pedestrian Network

- An open layout and interconnected network of streets should be provided, without cul-de-sacs.
- Streets should be well integrated with the existing street network.
- Where appropriate, streets should be laid out parallel and perpendicular to views to the estuary (primarily to the north-east). This will enable streetscapes to frame views and multiple houses to benefit from these vistas.
- Where sinkholes exist, streets should be laid out to provide for a maximum number of lots to abut these.
- Development should acknowledge future growth by providing for pedestrian and habitat linkages that align with key landscape features. Public Open Space
- Habitat Corridors should be developed within all new developments, with the use of indigenous landscape guides defined by Moyne Shire Council.
- Limestone sinkholes and other significant landscape features defined by Moyne Shire Council should be maintained and utilized as public open space and habitat zones.
- Habitat zones and open space corridors should be developed to accommodate key desire lines for pedestrian movement and should ensure new and existing areas of the town are well connected.

PRG CONCERNS

1. The Residential Design Guidelines, Peterborough, Victoria (May 2006) lists preferred plants and avoidance of pest plants, as well as size and height. The proposed subdivisions should incorporate substantial provision of indigenous planting to foster rehabilitation of the coastal flora and fauna.