

20 March 2026

Nicholson Street, St Leonards – Build-to-Rent (SSD-88113706)

VIA Addendum - Response to DPHI RFI

Executive summary

It is acknowledged there is a view impact on surrounding existing and approved residential developments (Telstra Exchange, The Landmark and St Leonards Square).

However as referred to in the VIA report dated September 2025 the nature and extent of impact is considered reasonable in the context of current NSW Government planning priorities related to delivery of housing:

- The proposal, essentially being for a tower in a tower context, is consistent with the strategic direction set for the St Leonards CBD, is of a nature and scale that is in keeping with the existing and desired future visual character of the St Leonards CBD and Crows Nest Accelerated Transport Oriented Development Program Precinct (the Crows Nest TOD)
- As such, the nature and extent of view impact is in keeping with what could reasonably be expected
- Although the proposal represents an increase in height, the bulk of the proposal generally aligns with the building envelope established by the approved SSDA scheme for this site
- In terms of height, the proposal is reasonable within its immediate context, having an increase in height no greater than that on adjoining land to the east, and lower than to the north
- Any development with these attributes on this site will inherently have considerable view impact on neighbouring properties,
- The loss of view is not unreasonable given it is a well-considered proposal that is meaningfully contributing to the delivery of a greater amount and choice of well-located, well designed new homes, consistent with the strategic planning framework.

1.0 Introduction

1.1 Purpose of this VIA addendum

The following VIA addendum is provided in response to the Request for Additional Information (RFI) from the Department of Planning, Housing and Infrastructure (DPHI) dated 20 January 2026 in relation to view impact.

In summary:

- **It is acknowledged that there is a view impact to surrounding residential developments, due to the proposals increased tower height, however the loss of view/s is not unreasonable given the retention of high value elements from impacted apartments.**
- **Having undertaken an assessment of view impact on 88 Christie Street, the qualitative assessed extent of the additional view impact from the proposal is minor-moderate. Given the proposal is only visible obliquely from this location, only views to the north Sydney skyline will be impacted, with iconic and**

high value elements, including Sydney Harbour, the Sydney Harbour Bridge the Sydney CBD, and the Anzac Bridge retained.

1.2 The DPHI RFI

The DPHI RFI is as follows:

The Department considers it important to balance the provision of housing with the amenity of the locality, while being mindful of impacts on surrounding development. The proposed height increase under the planning proposal and visual impact will result in severe view loss of iconic landmarks from existing and approved residential developments (Telstra Exchange BTR, The Landmark, and St Leonards Square.

'The Department requests a revised scheme and Planning Proposal that acknowledges and appropriately manages iconic and landmark views from existing and approved residential developments in the locality. The revised plans should be supported by an updated Visual Impact Assessment (VIA) and demonstrate how the proposed massing responds to view corridors'.

2.0 Further consideration of impacted buildings

2.1 Telstra Exchange BTR development

Only one elevation in 4 has a viewing direction toward the site.

Given the arrangement of the Telstra Exchange BTR development, only the Nicholson Street (south-west) elevation has a viewing direction towards the site.

Views from this elevation are highly vulnerable to considerable change

As has been noted, 69 Christie Street is located between the Telstra Exchange BTR development and Nicholson Street and the site. Essentially, the Telstra Exchange BTR development 'borrows' amenity in the form of views across and over this site.

Noting its attributes including its relatively large size and occupation by an ageing, commercial office building, as well as the strategic direction for the TOD for growth, it is reasonable to assume that some form of redevelopment will occur in the future 69 Christie Street. This may take the form of a building of considerable height. Given the orientation of the site, it is further likely that any such development take the form of a north-west to south-east aligned building. As such, views in the direction of the proposal are highly vulnerable to considerable change.

Only a relatively small number of additional apartments are impacted by the amended proposal

The extent and nature of views from the Nicholson Street elevation will vary based on a number of factors, including the height and placement of the relevant apartment along the elevation. Informed by the assessment of view impact within the VIA report dated September 2025, there are approximately 21 apartments across seven levels (out of the 366 total apartments within the development) located in the Telstra Exchange BTR development within the middle levels between the maximum height of the previously approved SSDA and the maximum height of the proposal (see typical floor plan of the Telstra Exchange BTR development below).

Iconic and high value elements impacted by the proposal from these apartments are located at a considerable distance

Views from these south-west facing apartments generally comprise iconic and high value elements at some distance. For example, the closest part of Sydney Harbour to the site to the west is 1.5km (approx.) away, and to the south of 2.5km (approx.) away. The northern pylon is 3.5km (approx.) away.

Iconic and high value elements include part of Sydney Harbour and its islands and foreshores from Darling Point to Balls Head, including parts of Lavender Bay, Berrys Bay, Balls Head Bay, and Darling Harbour. This includes part of the Sydney Harbour Bridge, the Walsh Bay finger wharves, Blues Point Tower, Barangaroo Headland Park, and Balls Head Reserve. The left (east) background comprises part of the eastern suburbs including the Bondi Junction skyline, the North Sydney CBD, the centre background comprises parts of the Sydney CBD, and the right (west) background comprises parts of Balmain and Pyrmont including the Anzac Bridge and Glebe Island Silos. Key building and structures in the of the CBD are visible in part, including Sydney Tower, and the former MLC Centre.

View impacts arise due to the increased height of the tower on these apartments to high value and iconic elements such as Sydney CBD north and east of Sydney Tower (excluding the upper parts of Sydney Tower, the MLC Centre and others), and the Sydney Harbour Bridge.

Key aspects of impacted views will be retained

However, a view corridor between the proposal and the Jackson Tower that includes the North Sydney CBD and features the line of Nicholson Street is retained. Views of the western Sydney CBD including Barangaroo, Darling Harbour, Balls Head Reserve, Pyrmont (including the Anzac Bridge) and the Balmain Peninsula will also be retained.

While the proposal removes visibility of some iconic and high value elements (noting that the approved SSDA envelope already blocks visibility to levels aligning with the maximum building height), the viewer will be able to recognise and appreciate other high value and iconic elements in the view as referenced above.

The Department has already accepted considerable view impact

The Department has already accepted considerable view impact from the building. This includes complete loss of visibility of the Sydney Harbour Bridge from viewpoints. This is a benchmark for consideration of additional view impact.

The proposal adopts massing and design measures to reduce impact

The roofline has intentionally been massed to create a variegated form that reduces bulk to better preserve views to part of Sydney Harbour and the Sydney CBD.

It is also noted that the building element positioned on the rooftop of the proposal is a glazed wind screen. This is of particular note for apartments located on the south-west façade and aligned with the maximum height of the proposal, noting that the glazed transparent material will assist in visibility beyond the building form.

On balance, the qualitative assessed extent of the additional view impact is acceptable

Overall, and as outlined in the VIA report the qualitative assessed extent of the additional view impact on a small portion of apartments located along the south-west elevation of the Telstra Exchange BTR development is considered acceptable.



Typical floor plan of the Telstra Exchange BTR development (south-west elevation to the south of this image)



VIA, September 2025 viewpoint locations diagram (viewpoints 10 & 11 demonstrate location of views assessed for the Telstra Exchange BTR development)

Source: Virtual Ideas

The Landmark

Given the arrangement of the complex, only the Nicholson Street (south-west) elevation has a viewing direction towards the site. The extent and nature of views from the Nicholson Street elevation will vary based on a number of factors, including the height and placement of the relevant apartment along the elevation.

Apartments located on the southwest elevation of The Landmark development between the maximum height of the previously approved SSDA and the maximum height of the proposal generally afford district views comprising high value elements and some iconic features in the midground and background including part of Sydney Harbour and its islands and foreshores, part of the Sydney CBD, Anzac Bridge and Sydney Harbour Bridge.

Only a relatively small number of additional apartments are impacted by the amended proposal. The extent and nature of views will vary based on a number of factors, including the height and placement of the relevant apartment along the elevation. There are approximately 28 apartments across seven levels (out of the 417 total apartments within the development) within the middle levels between the maximum height of the previously approved SSDA and the maximum height of the proposal.

While view impacts arise due to the increased height of the tower on a portion of apartments, the qualitative assessed extent of the additional view impact is minor-moderate, given views to the Sydney Harbour Bridge are retained (in relevant views) in addition to parts of the Sydney CBD and western portion of the Sydney Harbour and its islands and foreshores.

St Leonards Square

The arrangement of the St Leonards Square complex means that only the Nicholson Street elevation has its primary viewing direction towards the site.

Apartments located within the middle to upper levels along the south-west elevation of the St Leonards Square tower, between the maximum height of the previously approved SSDA and the maximum height of the proposal generally afford district views to the west comprising the Parramatta River and its islands and foreshores, and the Lane Cove River and its foreshores. With some apartments located on the upper levels to the north-west also affording views to the Sydney CBD, Sydney Harbour, and the Sydney Harbour Bridge.

Only a relatively small number of additional apartments are impacted by the amended proposal. The extent and nature of views will vary based on a number of factors, including the height and placement of the relevant apartment along the elevation. There are approximately 28 apartments across seven levels (out of the 527 total apartments within the development) within the middle levels between the maximum height of the previously approved SSDA and the maximum height of the proposal.

While view impacts arise due to the increased height of the tower and noting that the viewpoint from the upper level (at the maximum height of the previously approved SSDA), north-west elevation, looking south-west, will result in an increased view impact. The overall assessed extent of additional view impact of these apartments is qualitatively assessed as minor-moderate, given district views to the west and south are generally retained.

The VIA has not identified the potential view loss from the residential dwellings at 88 Christie Street. Please provide an updated VIA that addresses this matter, particularly the potential iconic view loss from this site.

88 Christie Street development

88 Christie Street is a mixed-use development, comprising three main towers above a podium and is located approximately 25m to the north-west of the site and separated from it by the intersection of Christie Lane, Nicholson Street and Christie Street.

Key attributes of the development generally include:

- Three towers
 - Two residential at 47 storeys and 26 storeys
 - One commercial/retail tower at 15 storeys
- Total of 647 apartments between the residential towers, featuring a mix of 1,2 and 3 bedroom dwellings
- Each building is generally rectangular in shape and has its long elevation orientated north-south.

The tallest residential tower is sited closest to the site and has the following elevations:

- Christie Lane, which has its primary viewing direction to the south
- Christie Street, which has its primary viewing direction to the east
- Northern elevation, which has its primary viewing direction to the north
- Western elevation, which has its primary viewing direction to the west.

Iconic and high value landscape elements are focussed to the south of the premises. In particular this includes Sydney Harbour as well as its foreshores and islands, the Sydney Harbour Bridge, the Sydney Operas House, the Sydney CBD (in particular Sydney Tower). It also includes the Parramatta River and Anzac Bridge. As such and as with the other towers already assessed in the existing VIA, the highest value views are generally to the south.

The siting and layout of the buildings relative to these iconic and high value landscape elements and the proposal means that the primary viewing direction of the southern elevation along Christie Lane is oblique to the site. As such, this is the elevation that is assessed within this VIA.

As the other elevations do not have their primary viewing direction towards the site, their views will not be directly impacted by the proposal.

The extent and nature of views from the Christie Lane elevation will vary based on a number of factors, including the height and placement of the relevant apartment along the elevation. It is reasonable to infer that the extent of views will increase as height in the building increases.



88 Christie, artists impression

Source: JQZ website

Viewpoints

Informed by the above, the following two viewpoints from 88 Christie were selected to undertake an assessment of view impact:

- Viewpoint 1: mid-level (below the top of the previously approved SSDA), south elevation, looking south to south-east, aligned with the maximum height of the approved development, and centred in the elevation
- Viewpoint 2: mid-upper level (at the maximum height of the previously approved SSDA), south elevation, looking south to south-east, aligned with the maximum height of the proposed development, and centred in the elevation.

By aligning with the maximum height of the approved development and that of the proposed development, these viewpoints enable a focus on view impact caused solely by the proposed additional height. It is assumed that given it has been approved by the Department, the loss of views caused by approved development is acceptable. It is further considered that the extent and nature forms a useful benchmark for considering the view impact of the greater height.

The location of these viewpoints is shown in the below figures.



Viewpoint locations – 88 Christie Street (3D)

Source: Virtual Ideas



Viewpoint locations – 88 Christie Street (2D)

Source: Virtual Ideas

Consistent with the VIA report dated September 2025, the below assessment of view impact from identified viewpoints within 88 Christie Street has been undertaken with consideration to the four steps of Tenacity.

To inform this assessment, three views have been prepared for each view:

1. Existing view without the approved development
2. Future view with the approved development
3. Future view with the proposed development.

To assist in enabling a focus on view impact caused solely by the proposed additional height, that part of the proposed development above the height of the approved development has been rendered in a more transparent colour to better see what is located in the landscape behind.

It is noted in this VIA a distinction is made between view change and view impact. Under Tenacity, view impact is the relevant test. As protection of all views would compromise many form of development view impact is weighted. Greater weighting being given to impact on iconic or high value elements. In general, a proposal must be impacting an iconic element for view impact to cross the threshold from moderate to severe impact.

Conversely, view change is independent of the presence of iconic or high value elements. As such under Tenacity, view change is given limited weight.

The nature of the iconic or high value element is also a relevant consideration. Ultimately, if the view that is remaining is sufficient to enable the recognition and appreciation of the element, the proposal is likely to be acceptable. This is particularly the case for elements that occupy large parts of views from many areas such as Sydney Harbour. Preventing any impact on the harbour, in particular from designated growth precincts such as St Leonards, could not be considered a reasonable outcome.

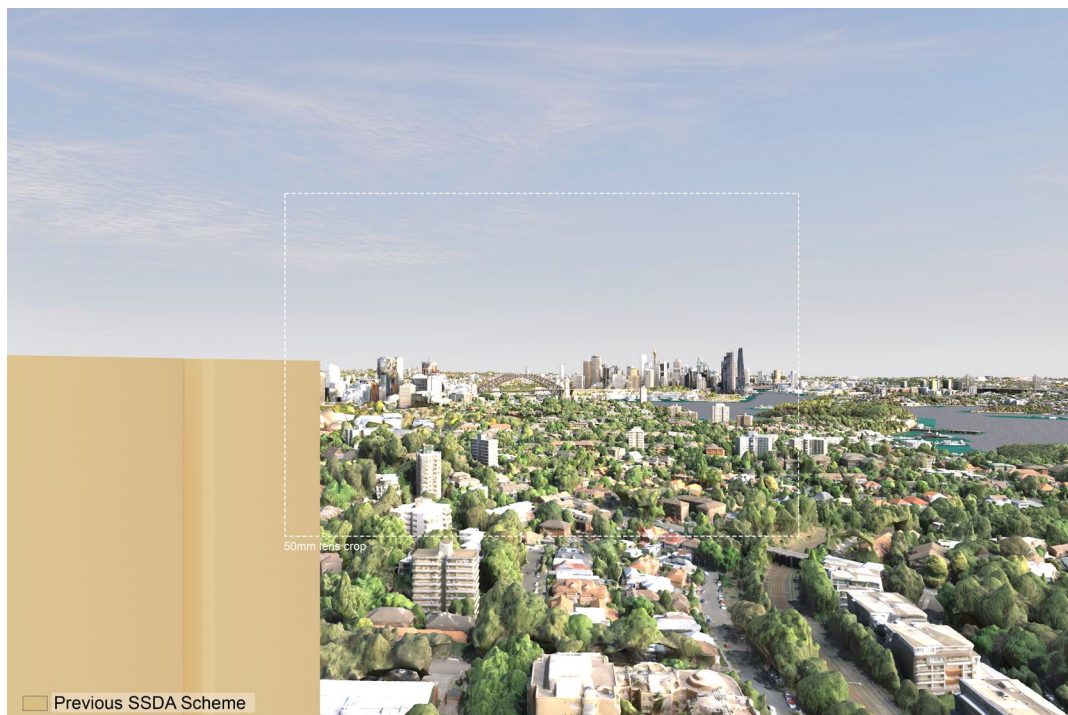
View impact assessment – 88 Christie Street

Viewpoint 1: mid-level, south elevation



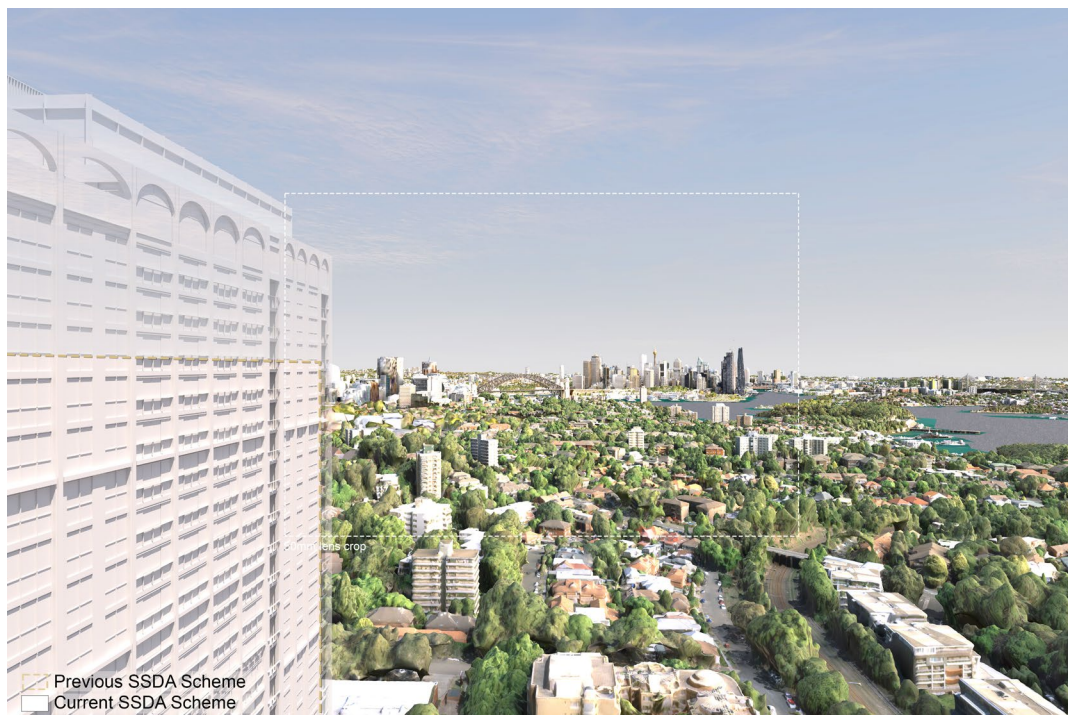
Viewpoint 1: mid-level, south elevation – Existing view

Source: Virtual Ideas



Viewpoint 1: mid-level, south elevation – previous SSDA scheme

Source: Virtual Ideas



Viewpoint 1: mid-level, south elevation – current SSDA scheme

Source: Virtual Ideas

Tenacity step 1: Assessment of the views to be affected

- This is a district view with panoramic attributes.
- The foreground and midground mainly comprises the roofs of houses and canopies of trees in the Lower North Shore. Spatially scattered medium to high rise apartment towers are notable visual elements within this part of the view.
- The midground comprises part of Sydney Harbour and its islands and foreshores from Sydney Cove to Balls Head, including parts of Lavender Bay, Berrys Bay, Balls Head Bay, Darling Harbour and Kirribilli Point. This includes part of the Sydney Harbour Bridge, the Walsh Bay finger wharves, Blues Point Tower, Barangaroo Headland Park, and Balls Head Reserve.
- The centre background comprises the Sydney CBD, with key buildings including the Sydney Tower visible in part.

Does the view include water?	Yes, this view includes water in the form of part of Sydney Harbour in the midground of the view.
Does the view include icons?	The view contains internationally recognised icons in the form of Sydney Harbour, and the Sydney Harbour Bridge. It also contains metropolitan and locally recognised icons in the form of Sydney CBD, and the Anzac Bridge.

Does the view include other high value elements?	Yes, the view contains other high value elements, such as Balls Head Reserve.
Assessed value of the view	The assessed value of this view is high. It contains internationally, metropolitan and locally recognised icons, and exhibits panoramic attributes.

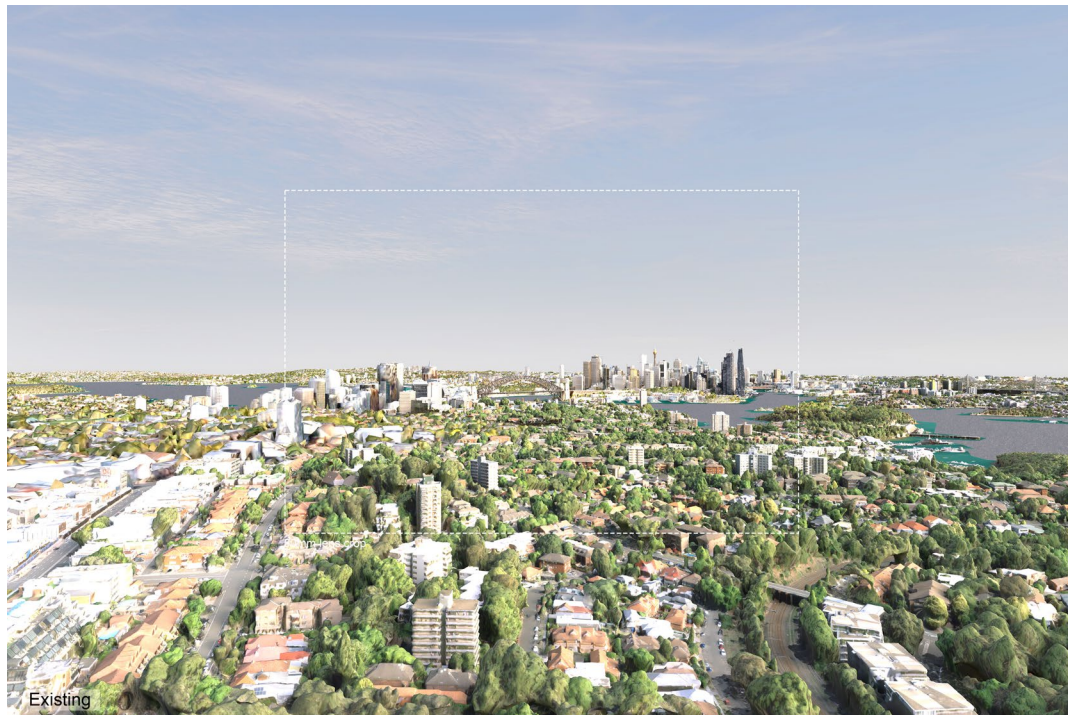
Tenacity step 2: Consider from what part of the property the views are obtained

- The view is obtained across a front boundary.
- The view is likely able to be obtained from both a standing and sitting position.
- However, as the viewer moves further back into the apartment, due to the effect of walls, floors and ceilings, the extent of the view is likely to decrease in height and width, reducing its panoramic qualities.

Tenacity step 3: Assess the extent of impact

- In terms of bulk, when seen from this view the proposal generally aligns with the building envelope established by the approved SSDA scheme.
- View impact arises due to increased tower height, and results in blocking views to the sky, with views to iconic elements retained.
- Given the site is located to the south-east, it is only visible obliquely from this location, enabling views beyond the proposal to the south (inclusive of iconic elements) to be retained.
- This retains the existing extent of views to Sydney Harbour, the Sydney Harbour Bridge, the Sydney CBD, and the Anzac Bridge.
- While the view change is moderate, overall the qualitative assessed extent of the additional view impact is minor.

Viewpoint 2: mid-upper level, south elevation



Viewpoint 2: mid-upper level, south elevation – Existing view

Source: Virtual Ideas



Viewpoint 2: mid-upper level, south elevation – previous SSDA scheme

Source: Virtual Ideas



Viewpoint 2: mid-upper level, south elevation – current SSDA scheme

Source: Virtual Ideas

Tenacity step 1: Assessment of the views to be affected

This is a district view with panoramic attributes.

The foreground and midground mainly comprises the roofs of houses and canopies of trees in the Lower North Shore. Spatially scattered medium to high rise apartment towers are notable visual elements within this part of the view.

The midground comprises part of Sydney Harbour and its islands and foreshores from Sydney Cove to Balls Head, including parts of Lavender Bay, Berrys Bay, Balls Head Bay, Darling Harbour and Kirribilli Point. This includes part of the Sydney Harbour Bridge, the Walsh Bay finger wharves, Blues Point Tower, Barangaroo Headland Park, and Balls Head Reserve.

The centre background comprises the Sydney CBD, with key buildings including the Sydney Tower visible in part.

Does the view include water?	Yes, this view includes water in the form of part of Sydney Harbour in the midground of the view.
Does the view include icons?	The view contains internationally recognised icons in the form of Sydney Harbour, and the Sydney Harbour Bridge. It also contains metropolitan and locally recognised icons in the form of Sydney CBD, and the Anzac Bridge.

Does the view include other high value elements?	Yes, the view contains other high value elements, such as Balls Head Reserve.
Assessed value of the view	The assessed value of this view is high. It contains internationally, metropolitan and locally recognised icons, and exhibits panoramic attributes.

Tenacity step 2: Consider from what part of the property the views are obtained

The view is obtained across a front boundary.

The view is likely able to be obtained from both a standing and sitting position.

However, as the viewer moves further back into the apartment, due to the effect of walls, floors and ceilings, the extent of the view is likely to decrease in height and width, reducing its panoramic qualities.

Tenacity step 3: Assess the extent of impact

- This view is notable for illustrating the comparable scale of 88 Christie Street and the proposal, with the proposal appearing of lesser height.
- In terms of bulk, when seen from this view the proposal generally aligns with the building envelope established by the approved SSDA scheme.
- View impact arises due to increased tower height.
- The increased tower height blocks views to land and water.
- In terms of water this mainly includes a portion of the Sydney Harbour visible to the left (east) of the North Sydney CBD around Kirribilli Point.
- Visibility of Clark Island is retained.
- Given the site is located to the south-east, it is only visible obliquely from this location, enabling views beyond the proposal to the south (inclusive of iconic elements) to be retained.
- The view change and qualitative assessed extent of the additional view impact is moderate.

Tenacity step 4 – Reasonableness of view impact

As discussed in the assessment of each view and in the VIA report dated, September 2025, the impact is acknowledged. However, weight is given to the following:

- The context in which these views are obtained, being from near the core of a strategic centre planned for considerable future growth under the strategic planning framework in the form of high-rise towers.
- Existing views within this context are typically particularly vulnerable to view impact arising from development.
- Given the above points, it is reasonable to expect some form of view impact and conversely unreasonable to expect retention of views in their current state.
- This is particularly the case for buildings located centrally within the CBD where views to iconic or high value elements are obtained over the long range across multiple properties.
- It is also noted, that given the siting of the site to the south-east of the 88 Christie Street development, views of the site are generally obtained obliquely, enabling views to the south in the direction of iconic elements such as the Sydney Harbour Bridge and parts of Sydney Harbour are retained.

3.0 Built form massing reduction

An amendment to the roofline of the proposed building form was undertaken in March 2026. Demonstrated in the diagram below this roofline amendment has resulted in a staggered reduction in building form, lowering the overall building height between 400mm – 1,250mm.



Built form massing reduction diagram

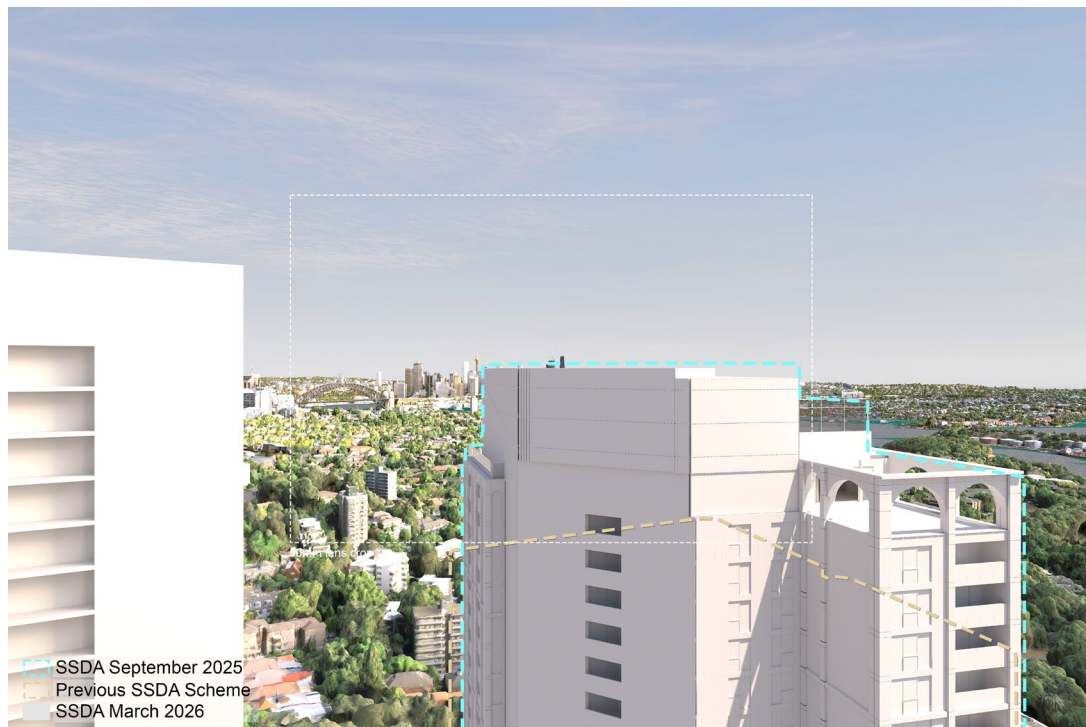
Source: Cox Architects

Updated photomontages incorporating the amended roofline from viewpoints from St Leonards Square, The Landmark and Telstra Exchange are as follows:



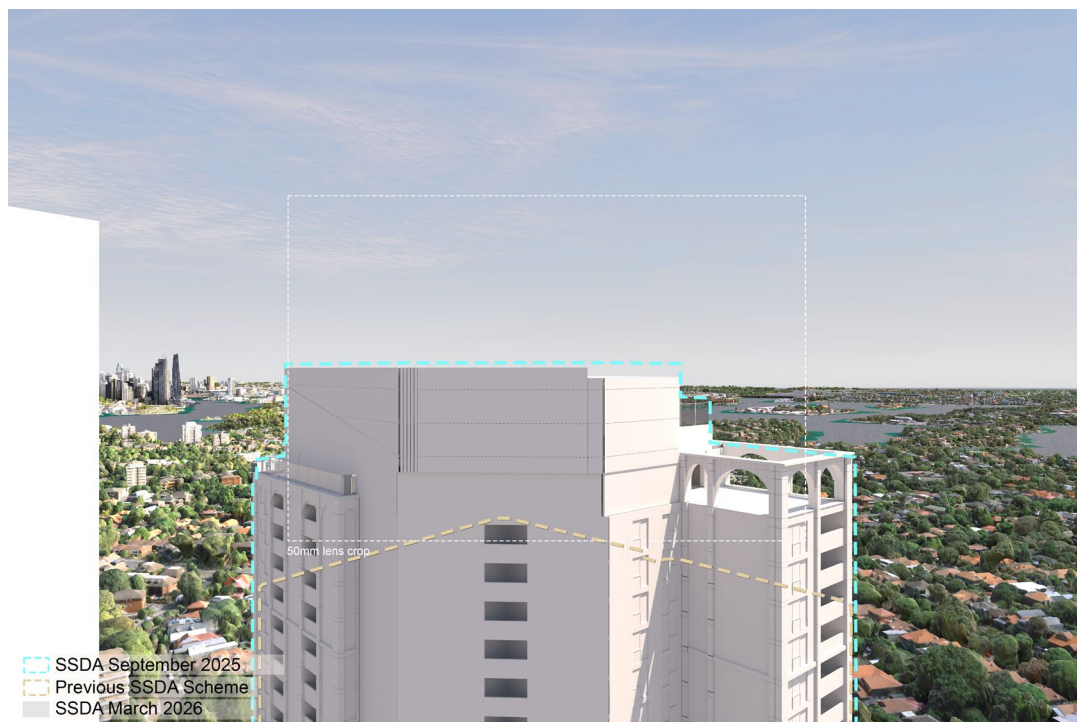
St Leonards Square, viewpoint 3: proposed view showing amended roofline and previous September 2025 scheme

Source: Virtual Ideas



The Landmark, viewpoint 8: proposed view showing amended roofline and previous September 2025 scheme

Source: Virtual Ideas



The Landmark, viewpoint 9: proposed view showing amended roofline and previous September 2025 scheme

Source: Virtual Ideas



Telstra Exchange, viewpoint 10: proposed view showing amended roofline and previous September 2025 scheme

Source: Virtual Ideas

With regard to the proposed amended roofline, the staggered reduction in building form results in improvements to views from the upper levels of St Leonards Square, The Landmark and Telstra Exchange, with increased portions of building silhouettes within the Sydney CBD and sky visible.

As noted above, and specifically for apartments positioned at the upper levels on the south-western facades of the Telstra Exchange and The Landmark; the transparent glazing material of the rooftop wind screen assists in facilitating view lines beyond the building form to parts of the Sydney Harbour, Sydney CBD and Balls Head Reserve.

4.0 Conclusion

As discussed in the VIA report dated, September 2025 and further emphasised at page one of this response, the view impact on surrounding existing and approved residential developments, including 88 Christie Street is acknowledged and generally assessed as minor-moderate. The nature and extent of impact is considered reasonable in the context of the considerable future growth identified within the strategic planning framework and current NSW Government planning priorities related to delivery of housing.

A handwritten signature in blue ink, appearing to read "Chris Bain".

Chris Bain
Director, Planning
Colliers Urban Planning