

Moorebank Precinct East Stage 2 Proposal Response to Submissions

Appendix F: Supplementary Visual Impact Response to Submission Information



SIMTA

SYDNEY INTERMODAL TERMINAL ALLIANCE

Part 4, Division 4.1, State Significant
Development

MEMORANDUM

ATTENTION CLAIRE VAHTRA
SENDER MICHAEL FASULLO
DATE 21/07/2017
PROJECT NUMBER 115123
SUBJECT MPE STAGE 2 RESPONSE TO SUBMISSIONS

Dear Claire,

This technical memorandum (technical memo) has been prepared to support responses to submissions (RtS) to the Environmental Impact Statement (EIS) for the Moorebank Precinct East (MPE) Stage 2 Proposal (the Proposal), in relation to visual impacts. These submissions are summarised as follows:

- Submissions from the NSW Department of Planning and Environment (NSW DP&E), relating to the viewpoint used, and associated visual impacts at viewpoint 14, to the east of the Proposal site.
- Submissions from Liverpool City Council (LCC), relating to:
 - o The visual impacts of the Proposal from the shared pedestrian/ cycle path to the east of the MPE site, including viewpoint 13
 - o The methodology used to undertake the visual impact assessment of the Proposal
 - o The extent of development of the Moorebank Precinct used in the assessment of visual impacts at viewpoints 04 and 05.
 - o the direction of the visual impact assessment at viewpoint 06
 - o the visual sensitivity at viewpoints 04 and 05, and the resulting visual impact assessment results

This technical memo should be read in conjunction with:

- The Visual Impact Assessment (VIA) for the Proposal, prepared by Reid Campbell, provided at Appendix R of the MPW Stage 2 EIS
- The MPE Stage 2 Response to Submissions report (MPE Stage 2 RtS), which includes an assessment of the visual impacts associated with the Amended Proposal.

Figure 1 that follows illustrates the viewpoints assessed in the MPE Stage 2 EIS and any additional viewpoints assessed as part of this memorandum.



Figure 1 - Viewpoints

1. Key Issues/Components

Item	Issue	Submission	Section Addressed
1	The view from the shared cycle/ pedestrian path between Anzac Road and Gracemere Court has been selected so that it is in front of a clump of trees, whereas the majority of the path has open views to the site. A more representative view is to be provided along with an assessment of the impact of the development on the recreational open space.	NSW DP&E	2.1 Response A
2	Viewpoint 13 was established as the only new viewpoint for this EIS. This was undertaken due to the opening of a linear parkland surrounding ANZAC creek to the East of the DJLU site and adjacent to the residential development of Wattle Grove. Viewpoint 13 was positioned to the west of viewpoint 12 from in the new parkland. The selection of this viewpoint was in appropriate as the photographer was positioned directly behind some foreground vegetation where there was scope to move further west to the main pathway through the park that lies adjacent to the western fencing. This position provides uninterrupted views to the MPE site and the Stage 2 works would be clearly visible to all the public users of the walking path.	LCC	2.1 Response A
3	<p>The perspectives created by viewpoints 04, 05 and 06 are misleading as they do not directly look at the works undertaken as part of MPE Stage 2. Viewpoints 04 and 05 are looking at the southern end of the MPE site and show the Stage 1 works but do not show the full extent of the development and therefore the full impact to the public from these two vantage points.</p> <p>Viewpoints 04 and 05 are located in Casula Park and locations where a wide segment of the public would be exposed to the development.</p> <p>Viewpoint 06 is not even directed towards the MPE site and therefore misleads the public as the extent that the development will affect residents within this area of Casula. These three viewpoints should be directed towards the development site and it is anticipated that the Visual Impact would be increased negatively.</p>	LCC	2.2 Response B
4	Viewpoints 04 and 05 are inconsistent in their assessment of Visual Sensitivity. This criteria focused on the likely duration of views and number of observers from a given viewpoint. This criteria is independent of the 'prominence' of the Proposal. Viewpoints 04 and 05 are both located with Casula park but receive very different weightings for Visual sensitivity, with assessments of Moderate/High and Low respectively. If the viewpoint 05 assessment was amended to match viewpoint 04 for both the construction and operation stages of the project then Visual Impacts would change from Low to Moderate/High.	LCC	2.3 Response C

2. Responses to Issues Raised

Issue – Item 1 (NSW DP&E)

The view from the shared cycle/ pedestrian path between Anzac Road and Gracemere Court has been selected so that it is in front of a clump of trees, whereas the majority of the path has open views to the site. A more representative view is to be provided along with an assessment of the impact of the development on the recreational open space.

Issue – Item 2 (LCC)

Viewpoint 13 was established as the only new viewpoint for this EIS. This was undertaken due to the opening of a linear parkland surrounding ANZAC creek to the East of the DJLU site and adjacent to the residential development of Wattle Grove. Viewpoint 13 was positioned to the west of viewpoint 12 from in the new parkland. The selection of this viewpoint was in appropriate as the photographer was positioned directly behind some foreground vegetation where there was scope to move further west to the main pathway through the park that lies adjacent to the western fencing. This position provides uninterrupted views to the MPE site and the Stage 2 works would be clearly visible to all the public users of the walking path.

2.1 Response A

Viewpoint 14 as shown on Figure 8 of the EIS Visual Impact Assessment (VIA, Reid Campbell, 2016) was located at the western end of Gracemere Court through a gated access point, facing towards the linear parkland adjacent to Wattle Grove.

In response to the above issue raised by NSW DP&E, a supplementary viewpoint (herein referred to as viewpoint 14a) has been included, an assessment of the visual impacts of the Proposal at this location has been undertaken. Viewpoint 14a is located approximately 200m north of viewpoint 14 included in the EIS and provides a more open view to the Proposal site from the East, and is therefore considered to be more representative of the view along the linear park. The location of supplementary viewpoint 14a is shown on Figure 1.

The existing view from viewpoint 14a is shown on Figure 2, and the simulated view; with the Proposal, is shown on Figure 3. Table 1 below details the visual impact assessment at this location, which noted that the Proposal would be prominent from this location. The existing context is that of an established industrial precinct and as such any addition of further industrial development, such as the Proposal would not detract from the visual amenity of this viewpoint. As a result, the visual impact is considered to be low/ moderate.

Viewpoint 14a



Figure 2 - Viewpoint 14a - Existing View



Figure 3 - Viewpoint 14a - Simulated View

Table 1

Visual impact assessment: supplementary viewpoint 14a

Viewpoint 14a	
Viewing location	East of site, Bicycle track near Gracemere Court
Visual Adaptation	
Approximate Viewing Distance	Viewpoint 14a is located approximately 560m east of the operational boundary of the Proposal site
Prominence of the Proposal	The Proposal would have some prominence from this location, but would be partially screened by existing structures on the existing DJLU site and vegetation.
Landscape Compatibility	<p>The addition of any industrial development within the Proposal site would have little to no impact on the existing landscape amenity at this viewpoint. The existing vegetation and the industrial elements located within the boundary of the Proposal site are already highly visible at this viewpoint.</p> <p>Landscaping would be provided along the eastern boundary of the Proposal site as part of the Proposal, which would help minimise any change to the existing landscape amenity and decrease prominence of the Proposal at this viewpoint, resulting in a low visual adaptation.</p>
Visual Sensitivity	The visual sensitivity would be relatively high at viewpoint 14a, as the view location is in a public space adjacent a low density residential area. However, this rating is decreased to moderate due to the close proximity to an existing, established industrial precinct.
Visual Impact	The Proposal would have some prominence from this location. The existing context is that of an established industrial precinct and as such the addition of any industrial development within the Proposal site would have little to no impact on the existing visual amenity at this viewpoint. As the visual adaptation is considered low, and the visual sensitivity is moderate, the Proposal would have a low/moderate visual impact at this location.

Issue – Item 3 (LCC)

The perspectives created by viewpoints 04, 05 and 06 are misleading as they do not directly look at the works undertaken as part of MPE Stage 2. Viewpoints 04 and 05 are looking at the southern end of the MPE site and show the Stage 1 works but do not show the full extent of the development and therefore the full impact to the public from these two vantage points.

Viewpoints 04 and 05 are located in Casula Park and locations where a wide segment of the public would be exposed to the development.

Viewpoint 06 is not even directed towards the MPE site and therefore misleads the public as the extent that the development will affect residents within this area of Casula. These three viewpoints should be directed towards the development site and it is anticipated that the Visual Impact would be increased negatively.

2.2 Response B

Visual impact assessment at viewpoint 04 and viewpoint 05

Viewpoints 04 and 05; located in Casula, as shown on Figure 8 of the EIS Visual Impact Assessment (VIA, Reid Campbell, 2016) are located west of the Proposal site and MPW site, in Casula. In response to the above issue raised by LCC, a revised assessment of the visual impacts of the Proposal at viewpoints 04 and 05 has been undertaken which show the extent of development across the Moorebank Precinct, inclusive of the Proposal, the MPE Stage 1 Project and the MPW Stage 2 Proposal.

The existing view from viewpoint 04 is shown on Figure 4, and the simulated view; with the Proposal, is shown on Figure 5. The existing view from viewpoint 05 is shown on Figure 6, and the simulated view; with the Proposal, is shown on Figure 7. The direction of view from this location is consistent with the viewpoints assessed in the MPE Concept EIS, and MPE Stage 1 Project EIS.

Table 2 and Table 3 below detail the revised visual impact assessment at viewpoints 04 and 05 respectively.

Direction of viewpoint 06

A revised assessment has not been undertaken as part of this response to submissions report in response to the above issue raise by LCC regarding the visual impact assessment at viewpoint 06. Figure 8 below shows the existing view at viewpoint 06 when the viewpoint is rotated to directly face the Proposal site. As evident in Figure 9, the existing residential development obstructs the view corridor towards the Proposal at this location. In addition, the distance from the Proposal site (approximately 850m) and the natural topography at this location further detracts from the potential for view corridors towards the site. The visual impacts at this location, when facing east towards the development are therefore negligible from publically accessible space, which is consistent with the EIS assessment of visual impacts at this location.

It should be noted that when selecting the viewpoints for undertaking the visual assessment of the MPE Project as part of the Concept EIS, viewpoints 04 and 05 were identified as appropriate as they not only provided viewpoints at public locations with views towards the MPE site, but also provided supplementary views for the residents in Buckland Road, where viewpoint 06 is located. Viewpoints 04 and 05 are therefore likely to depict the closest publicly available locations for which a representative visual impact can be inferred for viewpoint 06.

Viewpoint 04



Figure 4 - Viewpoint 04 - Existing View



Figure 5 - Viewpoint 04 – Simulated View

Table 2 *Revised visual impact assessment: viewpoint 04*

Viewpoint 04	
Viewing location	West of site, Carroll Park, Casula
Visual Adaptation	
Approximate Viewing Distance	Viewpoint 04 is located approximately 1,200m west of the operational boundary of the Proposal site.
Prominence of the Proposal	Viewpoint 04 is positioned in an elevated location within Carroll Park, looking down toward the main Southern Sydney Freight Line (SSFL) and Proposal site beyond.
Landscape Compatibility	<p>The existing landscape from this location comprises a Rail line Sydney Freight Line (SSFL) and Casula Powerhouse Arts Centre (formerly Casula Powerhouse) in the foreground and an expanse of industrial and infrastructure zoned land beyond with dense vegetation throughout. The existing dense vegetation provide some screening of the Proposal at this location.</p> <p>The landscape from this location is somewhat compatible with the Proposal due to the undulating topography of the area and distance from the development (approximately 1,200m to MPE). As part of the MPW Stage 2 Proposal, some vegetation which currently provides screening would be cleared and additional warehousing would be provided. At this viewpoint, the Proposal would be largely screened by the MPW Stage 2 Proposal, resulting in a low visual adaptation at this location.</p>
Visual Sensitivity	Being a residential area the visual sensitivity at viewpoint 04 is conserved to be high, with several houses within the area and users of the adjacent parkland being able to see the development. However, as the existing views at this location include industrial development on the MPW site and MPE site from historical land uses, included the School of Military Engineering and the DSND, the visual sensitivity at this viewpoint is considered to be moderate..
Visual Impact	The Proposal would be visible at this location but largely screened by the MPW Stage 2 Proposal. The majority of views from this location would only see parts of the Proposal that protrude above obstructions (tops of warehouses, tall equipment and light poles); however, the majority of the Proposal would be largely screened by the presence of the MPW Stage 2 Proposal. The topography of the area undulates, creating limitations to the extents of various view corridors. The proximity from the MPE Stage 2 Proposal is also significant enough to further decrease the magnitude of change that would be experienced from this location. These factors combined in the context of existing industrial proposals would mean that the addition of further development would result in a low/moderate visual impact.

Viewpoint 05



Figure 6 - Viewpoint 05 - Existing View



Figure 7 - Viewpoint 05 - Existing View

Table 3 *Revised visual impact assessment: viewpoint 05*

View 05	
Viewing location	West of site, Carroll Park, Casula
Visual Adaptation	
Approximate Viewing Distance	Viewpoint 05 is located approximately 1,200m west of the operational boundary of the Proposal site.
Prominence of the Development	Viewpoint 05 is positioned in an elevated location within Carroll Park, looking down toward the main Southern SSFL and Proposal site beyond.
Landscape Compatibility	<p>The existing landscape from this location comprises a Rail line (SSFL) and Casula Powerhouse Arts Centre (formerly Casula Powerhouse) in the foreground and an expanse of industrial and infrastructure zoned land beyond with dense vegetation throughout. The existing dense vegetation provide some screening of the Proposal at this location.</p> <p>The landscape from this location is somewhat compatible with the Proposal due to the undulating topography of the area and distance from the development (approximately 1,200m to MPE). As part of the MPW Stage 2 Proposal, some vegetation which currently provides screening would be cleared and additional warehousing would be provided. At this viewpoint, the Proposal would be largely screened by the MPW Stage 2 Proposal, resulting in a low visual adaptation at this location.</p>
Visual Sensitivity	Being a residential area the visual sensitivity at viewpoint 05 is conserved to be high, with several houses within the area and users of the adjacent parkland being able to see the development. However, as the existing views at this location include industrial development on the MPW site and MPE site from historical land uses, included the School of Military Engineering and the DSND, the visual sensitivity at this viewpoint is considered to be moderate.
Visual Impact	The Proposal would be visible at this location but largely screened by the MPW Stage 2 Proposal. The majority of views from this location would only see parts of the Proposal that protrude above obstructions (tops of warehouses, tall equipment and light poles); however, the majority of the Proposal would be largely screened by the presence of the MPW Stage 2 Proposal. The topography of the area undulates, creating limitations to the extents of various view corridors. The proximity from the MPE Stage 2 Proposal is also significant enough to further decrease the magnitude of change that would be experienced from this location. These factors combined in the context of existing industrial proposals would mean that the addition of further development would result in a low/moderate visual impact.



Figure 8 - Viewpoint 06 - Existing View

Issue – Item 4 (LCC)

Viewpoints 04 and 05 are inconsistent in their assessment of Visual Sensitivity. This criteria focused on the likely duration of views and number of observers from a given viewpoint. This criteria is independent of the 'prominence' of the Proposal. Viewpoints 04 and 05 are both located with Casula park but receive very different weightings for Visual sensitivity, with assessments of Moderate/High and Low respectively. If the viewpoint 05 assessment was amended to match viewpoint 04 for both the construction and operation stages of the project then Visual Impacts would change from Low to Moderate/High.

2.3 Response C

With regard to the comments made concerning the visual sensitivity applied to the assessment of viewpoints 04 and 05 (as included in Visual Impact Assessment at Appendix R of the EIS), Reid Campbell has reviewed and assessed previous findings to ensure accuracy and consistency. Findings in particular (as noted in a submission from Liverpool City Council) identified an inconsistency in the visual sensitivity of viewpoints 04 and 05 during the construction and operation phases of the Proposal. These inconsistencies have been tabulated below:

Table 4 – Visual sensitivity rating comparative table (operations vs. construction)

View Location Name	Area	Type	Visual Sensitivity EIS VIA (as assessed during operations phase)	Visual Sensitivity EIS VIA (as assessed during construction phase)
View 04	Casula	Public Space	Moderate	Moderate/High
View 05	Casula	Public Space	Moderate	Low

The inconsistency between findings for relatively similar viewpoints has been identified as an error in the initial report. To ensure accuracy both views were assessed against the criteria that defines how visual sensitivity is determined. Visual sensitivity for viewpoints 04 and 05 is therefore as follows:

*'Being a residential area the visual sensitivity would be relatively high. Several houses within the area and users of the park land would be able to see the development. This rating is lowered however due to the areas proximity to the site and its existing views of the industrial zoned land to the East, resulting in a **moderate** visual sensitivity.'*

Tables 2 and 3 in the 'Summary of Results' section of this Memorandum summarise visual impact findings including the amended sensitivity ratings above.

Summary of Results

Based on the their location and the works proposed, the visual impact during operations has been assessed for the following viewpoints:

Table 5 – Visual Impacts comparative table (operations)

View Location Name	Area	Type	Visual Adaptation	Visual Sensitivity	Visual Impact EIS VIA	Visual Impact RtS
View 04	Casula	Public space	Low	Moderate	Low/Moderate	Low/Moderate
View 05	Casula	Public space	Low	Moderate	Low/Moderate	Low/Moderate
View 06	Casula	Residential	Negligible	High	Negligible	Negligible
View 14a	Wattle Grove	Public space	Low	Moderate	N/A	Low/Moderate

Based on the their location and the works proposed, the visual impact during construction has been assessed for the following viewpoints:

Table 6 – Visual Impacts comparative table (construction)

View Location Name	Area	Type	Visual Adaptation	Visual Sensitivity	Visual Impact EIS VIA	Visual Impact RtS
View 04	Casula	Public space	Low	Moderate	Moderate/high	Low/Moderate
View 05	Casula	Public space	Low	Moderate	Low/Moderate	Low/Moderate
View 06	Casula	Residential	Negligible	High	Negligible	Negligible
View 14a	Wattle Grove	Public Space	Low/Moderate	Moderate	N/A	Moderate

Conclusion

The findings of the Visual Impact Assessment as included at Appendix R of the EIS were largely consistent with the findings of this Memorandum. The comments lodged in response to the EIS have been reviewed and where required, responded to in the above. The assessment of such has determined that visual impacts of the Proposal are generally consistent with those identified and assessed as part of the EIS VIA. Views from Casula did require amendment which is reflected in the findings, however do not deviate greatly from initial studies. An additional view (14a) was also included as part of this review and related findings were generally consistent with similar views that surround the North-East corner of the site. As such, the outcomes and recommendations of the assessment undertaken for the EIS VIA are still relevant and applicable.