



Proposed residential flat building with infill affordable housing at Lot 11 and 12 in DP1188210, 27 -29 Tryon Road, Lindfield (SSD-78669234)

RESPONSE TO SUBMISSIONS - VISUAL IMPACT

Prepared for:
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Cover image: Ivolve Studios



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I, John O'Grady, confirm this Visual Impact Assessment addresses the requirement of SEAR No.8 and relevant State and local legislation, policies, and guidelines including the *Guideline for landscape character and visual impact assessment – Environmental impact assessment practice note EIA-NO4* (December 2018) and the NSW Land and Environment Court Guidelines for Use of Photomontages. I further confirm that none of the information contained in this *Visual Impact Assessment* (OG Urban, December 2025) is false or misleading.

A handwritten signature in black ink, appearing to read 'John O'Grady', with a large circular flourish at the end.

John O'Grady,
Director, OG Urban

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1 INTRODUCTION

This Visual Analysis and Visual Impact Statement has been prepared in response to a modification of a State Significant Development Application (SSDA) for the construction of the proposed residential flat building, reference SSD-78669234. Specifically, the Statement responds to a Request for Additional Information (RFI) to the Proponent from Department of Planning, Housing and Infrastructure (PHI) dated 16 June 2025.

Attachment A to the RFI is a request note from PHI. The note requests that the Proponent provide evidence that the proposal as modified is consistent with the desired future character of the area and impacts on surrounding sites. This analysis and statement addresses the RFI with respect to the consistency of the proposal with the desired visual character of the locality.

The analysis has been carried out with reference to each of the viewpoints selected for the VIA for the proposal that accompanied the original SSDA (OG Urban, 4 March 2025).

2 PROPOSED MODIFIED DEVELOPMENT

The core changes to a development that are likely to be considerations for visual impact include building envelope (building height and setbacks from boundaries) and, potentially, façade articulation, materials and finishes.

Our understanding is that the following changes that would be relevant for visual impact are proposed in this Modification:

- Building to be a uniform height of 9 storeys with a maximum height of 28.6m in lieu of 7-9 storeys with variable roof heights between 25.86m and 28.6m.
- Increased site boundary setbacks from uniform 3m to GF – Level 3: **6m**; Level 4 – 7: **9m** & Level 8: **12m**
- Increased rear boundary setbacks as follows:
 - Rear Setback:
 - GF from 0m to 2.5m
 - Level 1 – 3: 2.5m (no change)
 - Level 4 – 8 from 5.35m to 6m.

3 PROCESS

The process for assessment of the visual impacts of this modified proposal is based on the process adopted for the original VIA (OG Urban, 4 March 2025). Commentary on the desired future character of the locality has been informed by information provided by GYDE Consulting.

The process incorporates the following tasks:

3.1 ASSESSMENT OF EXISTING CONDITIONS

This assessment was completed as part of the OG Urban March 2025 assessment. The information assembled in that assessment is sufficient to inform this review and no further assessment is required.

3.2 ASSESSMENT OF IMPACTS OF THE MODIFIED PROPOSAL ON LOCAL VIEWS

For consistency, the assessment of the modified proposal on local views adopted the critical viewpoints identified in the March 2025 assessment. It then followed the same assessment process including:

- Preparation of locationally accurate computer-generated photomontages from each of the

agreed critical viewpoints. These photomontages have been prepared in accordance with the NSW Land and Environment Court Guidelines for Use of Photomontages.

- Assessment of the potential visual impacts of the proposal with respect to:
 - Viewpoint sensitivity - the capacity of the visual environment to absorb change (as viewed from the agreed critical viewing points)
 - Change magnitude - the amount of change that would be experienced as a result of the implementation of the proposal (carried out with the aid of survey accurate photomontages prepared from agreed critical viewing points)
 - The visual quality of the changed visual environment in comparison with the environment prior to development.
- Identification of mitigation measures to address any unacceptable impacts on views that may result from implementation of the Proposal in its current form.

4 DESIRED FUTURE CHARACTER

The following description of the likely desired future character of the Lindfield precinct has been derived from information provided by Gyde Consulting.

As noted in the Request for Additional Information letter, Chapter 5 of the Housing SEPP relating to Transport Orientated Development no longer applies to the Ku-ring-gai local government area, with the exception of lots that on, or before, 13 June 2025, had valid SEARs and SSD applications lodged but not yet determined. The proposal for 27-29 Tryon Road, Lindfield was lodged on 2 April 2025 and the subject site has therefore been saved under the transitional provisions and mapped on the revised TOD Map as shown in Figure 4-1



Figure 4-1 – Revised TOD map – site edged red (Gyde Consulting)

However, this legislative amendment means that the desired future character of the area is no longer that considered within the EIS that was lodged on 2 April 2025. The desired future character of the area is likely to be determined by Ku-ring-gai Council's Stations Precincts SEPP, which was gazetted on 14 November 2025. Therefore, additional consideration is provided below to outline how the proposed development is consistent with the likely desired future character.

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Ku-ring-Gai Council's Ku-ring-gai Council's Stations Precincts SEPP contains revised planning controls for Lindfield, including updated zoning, height of building, FSR and affordable housing maps as shown in Figure 2. A summary of the relevant changes is as follows:

- The Land Zoning Map has been updated, including a change in zoning for the area surrounding the site, which has increased the area of R4 high density residential zoning to the south of the site. The sites immediately to the rear of the site are therefore upzoned from R2 Low Density Residential to R4 High Density Residential. The zoning of the site remains the same.

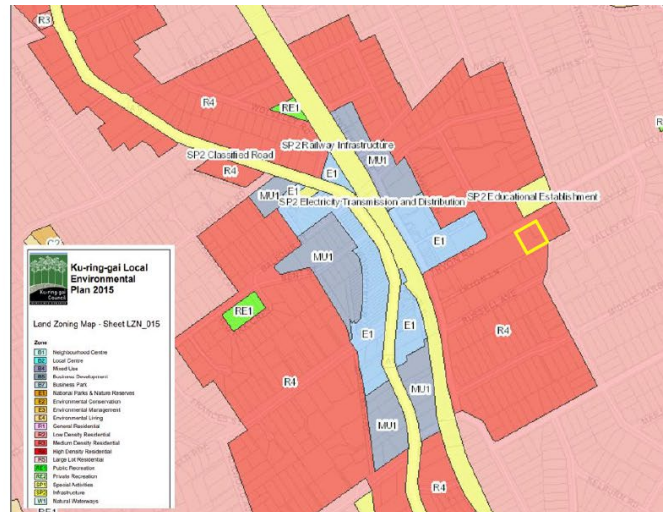
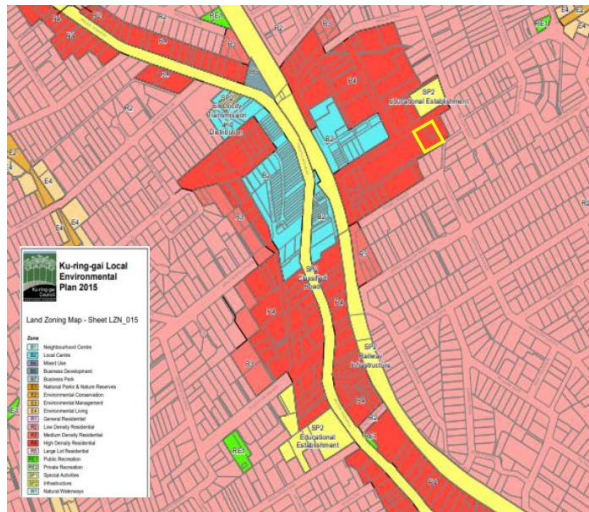


Figure 4-2 Previous Land Zoning Map (Source: Gyde - KLEP) Figure 4-3 Stations Precinct Land Zoning Map (Source: Gyde - KRG Council)

- The Height of Building Map has been updated to increase the height of the site from 17.5m to 18.5m. Immediately to the west of the site the height has increased from 17.5m to 29m, significantly increasing the density of this area. This pattern is repeated around the site, increasing sites closer to Lindfield Station up to 29m and stepping down to 18.5m of the edge of the R4 zoned land.



Figure 4-4 Previous Height of Buildings map

Figure 4-5 Stations Precinct - HOB map (Gyde - KRG Cncl).

- The FSR Map has been updated to reflect the increased density resulting from the amended height of buildings controls. The FSR on the subject site has been increased from 0.3:1 to 1.3:1. The area immediately to the west has increased to 1.8:1.

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Figure 4-6 Previous FSR Map (Source: Ku-Ring-Gai LEP)

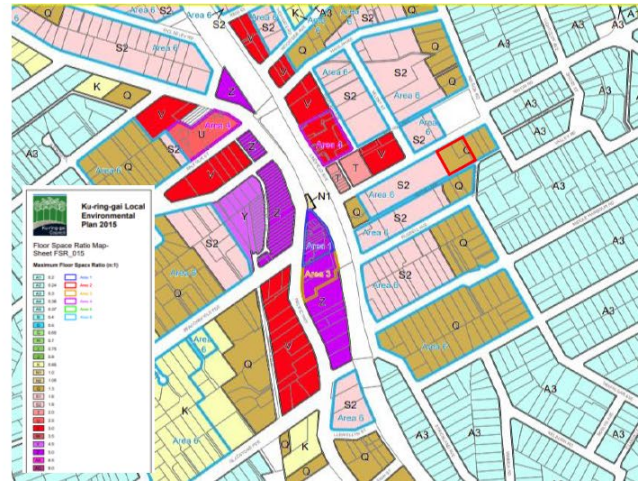


Figure 4-7 Stations Precinct FSR Map (Source: KRG Council)

- An Affordable Housing Map has been prepared. The site, under the KLEP Stations Precincts SEPP, would not be subject to affordable housing provision



Figure 4-8 Stations Precinct 2025 Affordable Housing Contributions (Source: KRG Council)

From a review of the revised controls, the desired future character of the area appears to be an increase in density to the west of the site towards Lindfield Station, providing greater density close to well-connected public transport hubs, stepping down in density towards the R2 low density residential zoned land to the east, outside the town centre boundary. The increase in density to the west exceeds the 22m building height proposed under the TOD and will likely result in residential flat buildings of up to 10 storeys in this area. Development is then envisioned to step down to approximately 18.5m (or 22m for saved TOD sites such as the subject site) towards the R2 zoned land to the east which has a height of 9.5m.

4.1.1 Implications of the planning controls for the urban character of Lindfield and its environs

The development site is located within 250m of Lindfield Train Station and is an area in transition due to the Transport Orientated Development (TOD) and In-fill Affordable Housing planning reforms. Lindfield has been identified as a TOD area under Chapter 5 of the Housing SEPP 2021 which allows for a maximum FSR of 2.5:1 and a maximum building height of 22m for residential flat buildings for sites within 400m of Lindfield Station. The application of the TOD requires a 2% affordable housing contribution in perpetuity. In addition to this, DPHI are also encouraging the delivery of new In-fill Affordable Housing under Chapter 2 of the Housing SEPP 2021 to meet the needs of very low-, low- and moderate-income households. The In-fill Affordable Housing provisions allow an uplift of up to 30% for height and FSR controls if 15% affordable housing is provided for a period of 15 years. This results in an applicable building height of up to 28.6m for the site and surrounding sites for the purposes of residential flat buildings, subject to providing 17% affordable housing. As such, the area is set to undergo significant change in its urban character, specifically in locations within 400m of the station where:

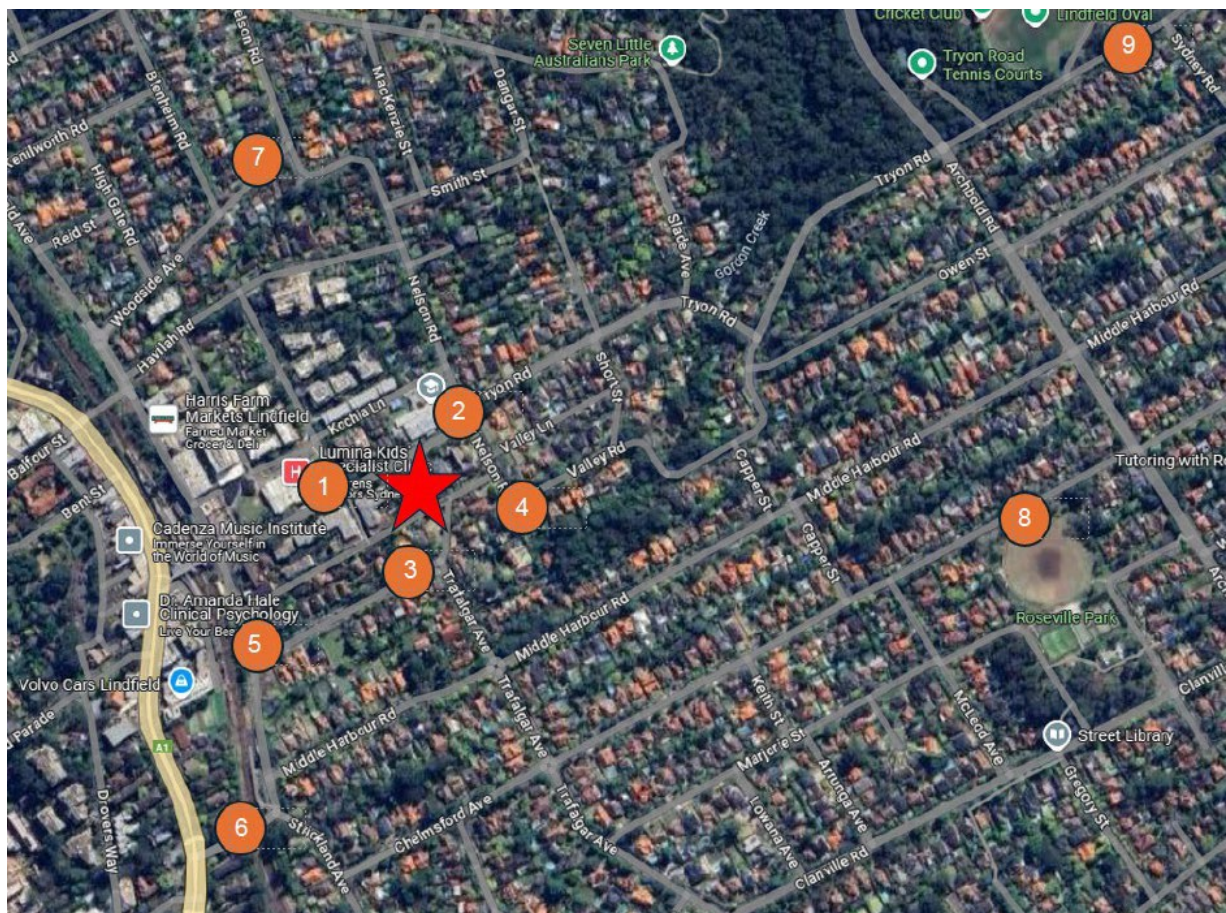
- Maximum permissible building heights will be 28.6m.
- Maximum FSR will be base control plus 30%.

5 VIEW ANALYSIS

Critical viewpoints within the likely view catchment of the site are identical to the SSDA VIA (OG Urban, March 2025). The viewpoints were selected as representative locations that would:

- Be potentially subject to changes in views as a result of the development; and
- Be sensitive to these changes to views as a result of the expectations of viewers.

The approximate locations of the selected viewpoints are indicated on Figure 6-1. Amended photomontages have been prepared from these viewpoints to illustrate the changes to these views that would result from implementation of the proposal as modified. These are included in Section 7 of the report.



Subject site

VP1	Tryon Rd, cnr Milray St, Lindfield	VP2	Tryon Rd, cnr Nelson Rd, Lindfield
VP3	Russell Ave, near cnr Trafalgar Ave, Lindfield	VP4	Nelson rd, cnr Valley Rd, Lindfield
VP5	Lindfield Ave, near cnr Russell Ave, Lindfield	VP6	Strickland Ave, Lindfield - Railway overbridge
VP7	Woodside Ave, near cnr Nelson Rd, Lindfield	VP8	Roseville Park, Chelmsford Ave, Roseville
VP9	Tryon Rd, near Lindfield Oval, Lindfield		

Figure 6-1 Selected viewpoints

6 VISUAL IMPACT ASSESSMENT

Again for consistency, this assessment of the likely impacts of the SSDA proposal as modified on local visual quality has been carried out via a process of qualitatively assessing:

- Viewpoint sensitivity – the level of value that viewers would be likely to attribute to the quality of views from a given location.

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- Change magnitude – the amount of change to views from given locations that would likely result from implementation of the proposed development.
- Composite impact level – a value judgement based on the assessed sensitivity of the viewpoint and the amount of change that would be likely to occur to the specific view or views from similar locations.

Viewpoint location descriptions and viewpoint sensitivities remain unchanged for this assessment so detail is not provided for each of these criteria in this report.

Ivolve Studios have prepared additional photomontages that include indicative mass modelling to illustrate permissible building heights under the TOD and Infill Affordable Housing provisions of the Housing SEPP as well as the Stations Precincts SEPP for the locality.

6.1 VIEWPOINT 1 – TRYON RD, CNR MILRAY ST

Viewpoint	Visual sensitivity	Change magnitude	Composite impacts assessment
Close views			
Viewpoint 1	Moderate-high	Moderate	Moderate



Figure 7-1 Viewpoint 1 – 24mm focal length



Figure 7-2 Viewpoint 1 – photomontage 24mm focal length - Model edged red (Involve Studios).



Figure 7-3 Viewpoint 1 – photomontage – 24mm focal length (Ivolve Studios)



Figure 7-4 Viewpoint 1 – photomontage – 24mm focal length – Indicative preferred massing for nearby sites shaded red / grey (Ivolve Studios)

Change magnitude: Moderate

The photomontage at Figure 7-2 indicates that the proposed development in its modified form will present as a new built skyline element in views from the Southwest in the vicinity of the Lindfield East

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shopping precinct. The proposed building will continue to appear as a new skyline element in these views. It will, however, read as a somewhat more recessive element due to its simplified façade and roof treatment, leading to a cleaner and less complicated presentation to the street. The level of loss of visible sky in the view remains acceptable in the context of the broader built environment.

The photomontage at Figure 7-3 illustrates that with the Housing SEPP planning reforms implemented on adjacent sites, the proposed building would remain completely consistent with the likely future built character of the locality.

On balance, notwithstanding the implications of the planning reforms, the overall change magnitude for this viewpoint with respect to current conditions remains as moderate.

Composite impact level: Moderate

6.2 VIEWPOINT 2 – TRYON RD, CNR NELSON RD

Assessment summary

Viewpoint	Visual sensitivity	Change magnitude	Composite impacts assessment
Close views			
Viewpoint 2	Moderate	Low - moderate	Low - moderate



Figure 7-5 Viewpoint 2 – Base photo 24mm focal length



Figure 7-6 Viewpoint 2 – Photomontage – Building outline (Ivolve Studios)



Figure 7-7 Viewpoint 2 – photomontage 24mm focal length (Involve Studios).



Figure 7-8 Viewpoint 2 – photomontage – 24mm focal length – Indicative preferred massing for nearby sites shaded red / grey (Involve Studios)

Change magnitude: Low - moderate

The photomontage at Figure 7-7 indicates that the proposed building will be largely screened in these views by existing street trees and built form on the southeastern side of Tryon Rd. The development would not result in any significant loss of visible open sky. The building would, however, be more visible from the south eastern footpath and from properties on this side of the road, where street trees would not provide the same level of screening.

The photomontage at Figure 7-8 indicates that the future visual character of this part of Tryon street is subject to major change coming out of the planning reforms for the area.

The overall magnitude of change to these views that would result from the proposal as modified remains low to moderate.

Composite impact level: Low - moderate

6.3 VIEWPOINT 3 – RUSSELL AVE NEAR CNR TRAFALGAR AVE

Assessment summary

Viewpoint	Visual sensitivity	Change magnitude	Composite impacts assessment
Close views			
Viewpoint 3	Moderate - high	High	High



Figure 7-9 Viewpoint 3 – base photo 24mm focal length



Figure 7-10 Viewpoint 3 – photomontage 24mm focal length - Model edged red (Involve Studios).



Figure 7-11 Viewpoint 3 – photomontage (Ivolve Studios)



Figure 7-12 Viewpoint 3 – photomontage – 24mm focal length – Indicative preferred massing for nearby sites shaded red / grey (Ivolve Studios).

Change magnitude: High

The photomontage at Figure 7-11 illustrates that the new building as modified will continue to present as a significant new skyline element in these views. The simplified roof form in comparison to the proposal pre-modification has somewhat increased the perception of bulk of the building in close views from the

south.

Indicative envelopes on the photomontage at Figure 7-12 illustrate that, again, with the planning reforms implemented on adjacent sites, the proposed building would be consistent with local building heights and the likely future built character of the locality.

With respect to current conditions, the overall magnitude of change generated by the proposal in these close views from established residential areas to the south remains High.

Composite impact level: High

6.4 VIEWPOINT 4 – NELSON RD, CNR VALLEY RD

Assessment summary

Viewpoint	Visual sensitivity	Change magnitude	Composite impacts assessment
Close views			
Viewpoint 4	Moderate-high	Moderate - high	Moderate - high



Figure 9-9 Viewpoint 4 – base photo 24mm focal length



Figure 9-2 Viewpoint 4 – photomontage 24mm focal length - Model edged red (Ivolve Studios).



Figure 9-10 Viewpoint 4 – photomontage (Involve Studios)

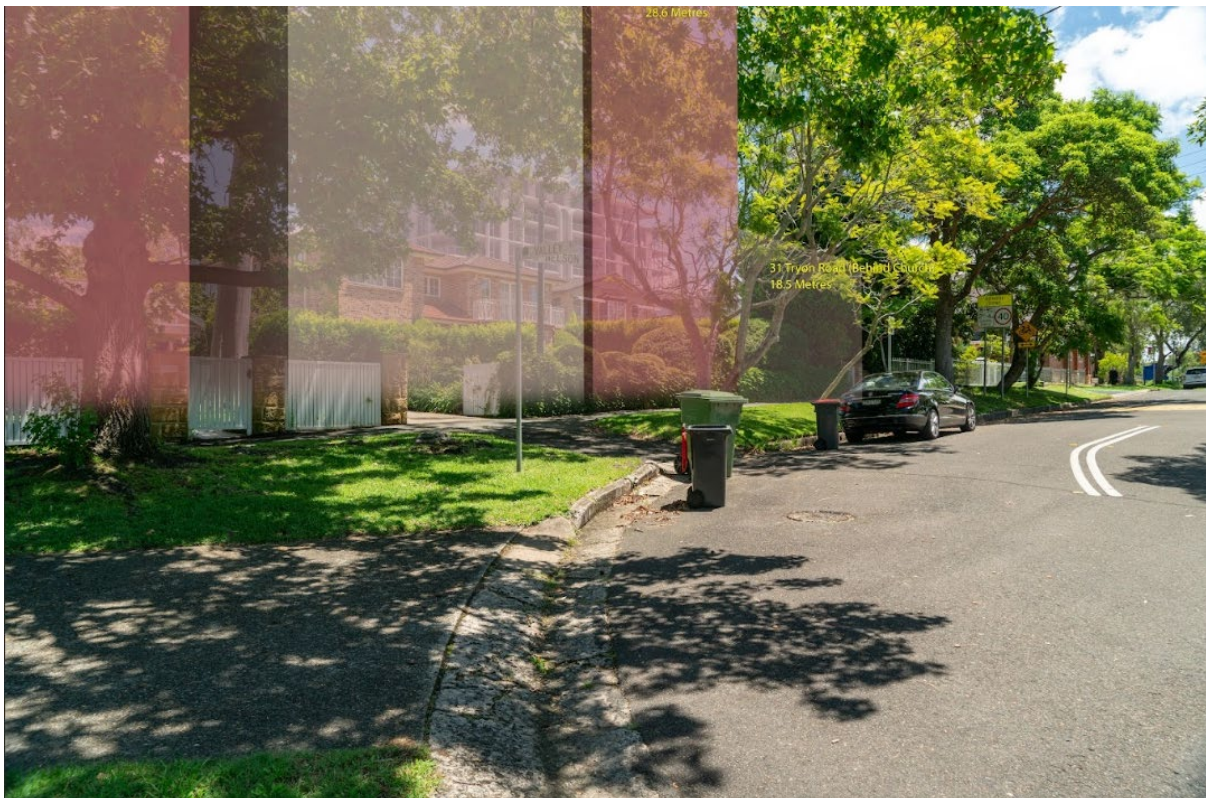


Figure 9-11 Viewpoint 2 – photomontage – 24mm focal length – Indicative preferred massing for nearby sites shaded red / grey (Involve Studios).

Change magnitude: Moderate-High

The proposed building as modified would be visible as a new skyline element in these close views from established residential areas to the southeast. Foreground vegetation would soften some views, but the building would create a substantial new built element on the skyline and would also result in loss of a

moderate amount of visible sky.

Indicative envelopes on the photomontage at Figure 9-11 illustrate that, again, with the planning reforms implemented on adjacent sites, the proposed building would be consistent with local building heights and the likely future built character of the locality.

On balance, notwithstanding the implications of the planning reforms, the overall change magnitude for this viewpoint with respect to current conditions is considered to be moderate to high.

Composite impact level: Moderate- High

6.5 VIEWPOINT 5 – LINDFIELD AVE NEAR CNR RUSSELL AVE

Assessment summary

Viewpoint	Visual sensitivity	Change magnitude	Composite impacts assessment
Medium distant views			
Viewpoint 5	Moderate	Low	Low



Figure 9-12 Viewpoint 5 – 24mm focal length



Figure 9-13 Viewpoint 5 – photomontage 24mm focal length (Ivolve Studios)



Figure 9-14 Viewpoint 5 – photomontage 24mm focal length - Model edged red (Ivolve Studios).

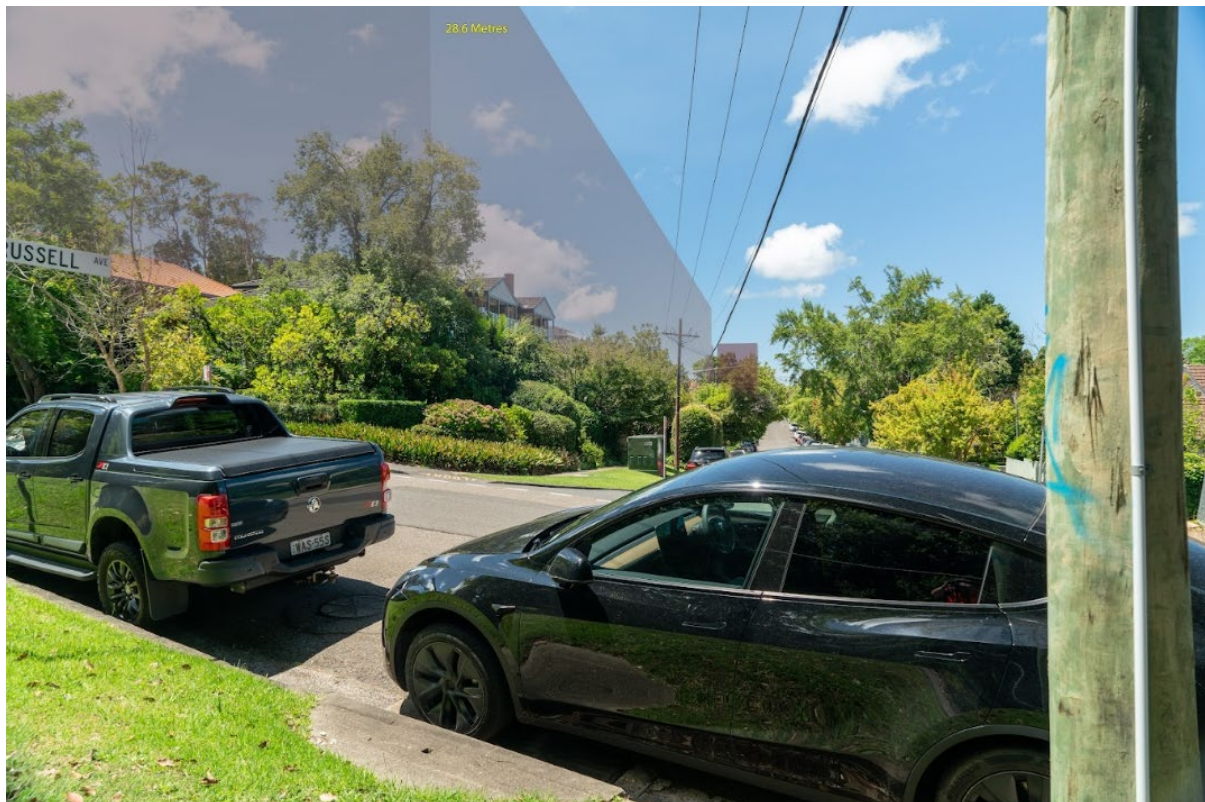


Figure 9-15 Viewpoint 5 – photomontage – 24mm focal length – Indicative preferred massing for nearby sites shaded red / grey (Ivolve Studios)

Change magnitude: Low

The photomontage at Figure 9-14 indicates that the proposed building will be marginally more visible due to its increased height but would remain almost completely screened by existing trees and buildings in

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views over medium distances from the south west. Overall, the impact of the development on views from these locations is considered to be low.

The photomontage at Figure 9-15 indicates that local visual character would potentially be subject to dramatic change with implementation of the planning reforms.

Composite impact level: Low

6.6 VIEWPOINT 6 – STRICKLAND AVE, RAILWAY OVERBRIDGE

Viewpoint	Visual sensitivity	Change magnitude	Composite impacts assessment
Medium distant views			
Viewpoint 6	Low - moderate	Negligible	Negligible



Figure 9-15 Viewpoint 6 – 24mm focal length



Figure 9-16 Viewpoint 6 - photomontage 24mm focal length - Model edged red (Ivolve Studios).



Figure 9-17 Viewpoint 6 – photomontage – 24mm focal length (Ivolve Studios)



Figure 9-18 Viewpoint 6 – photomontage – 24mm focal length – Indicative preferred massing for nearby sites shaded red / grey (Ivolve Studios)

Change magnitude: Low

The photomontages at Figures 9-16 & 9-17 indicate that from Viewpoint 6, the developed site would appear as a small component of the existing broad and expansive views available from this locality. The

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magnitude of change to these views that would be generated by the proposal as modified would remain low.

The photomontage at Figure 9-18 indicates that the skyline would change dramatically in these views with implementation of the planning reforms.

Composite impact level: Low

6.7 VIEWPOINT 7 – WOODSIDE AVE NEAR CNR NELSON RD

Assessment summary

Viewpoint	Visual sensitivity	Change magnitude	Composite impacts assessment
Medium distant views			
Viewpoint 7	Low - moderate	Negligible	Negligible



Figure 9-19 Viewpoint 7 – 24mm focal length



Figure 9.20 Viewpoint 7 - photomontage 24mm focal length - Model edged red (Ivolve Studios).



Figure 9-21 Viewpoint 7 – Photomontage 24mm focal length (Ivolve Studios)



Figure 9-22 - Viewpoint 7 – photomontage – 24mm focal length – Indicative preferred massing for nearby sites shaded red / grey (Ivolve Studios)

Change magnitude: Low -Negligible

The photomontages at Figures 9-20 & 9-21 indicate that the proposal as modified would remain screened by foreground development and would not be visible from this viewpoint. The proposed new building may however be partially visible from locations further to the south where foreground screening is less dense. The overall magnitude of change to these views that would result from the proposal is considered to remain low to negligible.

The photomontage at Figure 9-22 indicates that with implementation of the planning reforms, there is potential for moderate change to views in the direction of the Lindfield centre from suburban streets to the north. Existing foreground vegetation and topography would, however, play a substantial role in screening the new development in these views.

Composite impact level: Low-Negligible

6.8 VIEWPOINT 8 – ROSEVILLE PARK, CHELMSFORD AVE

Viewpoint	Visual sensitivity	Change magnitude	Composite impacts assessment
Medium distant views			
Viewpoint 8	High	Negligible	Negligible



Figure 9-23 Viewpoint 8 – 24mm focal length



Figure 9-24 Viewpoint 8 - photomontage 24mm focal length - Model edged red (Ivolve Studios).



Figure 9-25 Viewpoint 8 – photomontage – 24mm focal length (Ivolve Studios)



9-26 Viewpoint 8 – photomontage – 24mm focal length – Indicative preferred massing for nearby sites shaded red / grey (Ivolve Studios)

Figure

Change magnitude: Negligible

The photomontages at Figures 9-24 & 9-25 indicate that the proposed development would be completely screened by topography, existing built form and foreground vegetation in these views. The resulting magnitude of change resulting from the proposed development as modified to these views would be negligible.

The photomontage at Figure 9-26 indicates that development of the locality as contemplated by the planning reforms would essentially be completely screened in these locations and the visual character would likely remain unchanged.

Composite impact level: Negligible

6.9 VIEWPOINT 9 – TRYON RD NEAR LINDFIELD OVAL

Viewpoint	Visual sensitivity	Change magnitude	Composite impacts assessment
Medium distant views			
Viewpoint 9	High	Low	Low



Figure 9-27 Viewpoint 9 – 24mm focal length



Figure 9-28 photomontage 24mm focal length - Model edged red (Involve Studios).



Figure 9-29 Viewpoint 9 – photomontage – 24mm focal length (Ivolve Studios)



Figure 9-30 Viewpoint 9 – photomontage – 24mm focal length – Indicative preferred massing for nearby sites shaded red / grey (Ivolve Studios).

Change magnitude: Low

The photomontage at Figures 9-28 & 9-29 indicate that the development in its proposed modified form site would continue to appear as a very minor element of additional built form in these views, being almost

completely screened by foreground buildings and trees. Accordingly, the change magnitude resulting from the proposal is considered to be low.

The photomontage at Figure 9-30 indicates that the skyline would be subject to moderate change in these views with implementation of the planning reforms. The development as modified would be entirely consistent with this future visual character.

Composite impact level: Low

6.10 SUMMARY OF VISUAL IMPACTS

The table below summarises the assessment of impacts of the proposal on the selected viewpoints.

Viewpoint	Visual sensitivity	Change magnitude	Composite impacts assessment
Viewpoint 1	Moderate-high	Moderate	Moderate
Viewpoint 2	Moderate	Low - moderate	Low - moderate
Viewpoint 3	Moderate - high	High	High
Viewpoint 4	Moderate-high	High	High
Viewpoint 5	Moderate	Low	Low
Viewpoint 6	Low - moderate	Negligible	Negligible
Viewpoint 7	Low - moderate	Negligible	Negligible
Viewpoint 8	High	Negligible	Negligible
Viewpoint 9	Moderate - high	Low	Low

7 CUMULATIVE IMPACTS

The State Government's planning reforms and the draft changes to these contemplated by the Ku-ring-gai Stations Precinct SEPP will yield major changes to the future visual and urban character of Lindfield. In this context, the proposed residential flat building that is the subject of this Modification Application will remain of a form and contemporary architectural style that would be consistent with the changing character of its locality. It is considered that the cumulative visual impacts of the proposal with recent and likely future medium to high density residential development in the locality would be consistent with the future character envisaged by the controls and acceptable in this context.

8 CONCLUSIONS & RECOMMENDATIONS

This visual impact assessment has been prepared to accompany a Modification Application to Significant Development Application 78669234 to the NSW Department of Planning, Housing and Infrastructure for a proposed 9-storey residential flat building with in-fill affordable housing at Lot 11 and 12 in DP1188210, 27-29 Tryon Road, Lindfield. The assessment is a review of the original visual impact assessment for the SSDA (OG Urban 4 March 2025) and is intended to provide a response to a request for additional information from Department of Planning, Housing and Infrastructure (PHI) dated 16 June 2025. Specifically, the RFI asked for an assessment of the response of the proposal as modified on the desired future character of the locality.

The assessment has been carried out with the aid of a series of amended photomontages based on a 3D model of the proposal as modified. The montages were prepared from identical viewpoints used in the March 2025 VIA.

8.1 VISUAL IMPACTS

In summary, the conclusions of the visual impacts of the proposal as modified are:

- The proposed development as modified will not result in appreciably changed visual impacts in its locality when compared with the original SSDA. The proposal will be marginally more visible in close views of the proposal from the south and south west but these impacts are not considered to be at sufficient levels to change the Composite Impact assessments from the original VIA. Conversely, the increased setbacks of the proposal to its side boundaries will lead to lesser impacts on adjoining and nearby properties to the east and west of the site.
- The future visual character of the proposal site and its locality is subject to the significant change contemplated by the suite of planning reforms changes recently implemented or in draft form. Within the context of these changed controls, and the potential for increased height and density of residential and mixed use development, the proposed development as modified will remain consistent with the emerging built form envisaged by the planning reforms and is considered to be entirely consistent with the likely future urban character of its locality.
- In summary, the proposal as modified will have an appropriate visual relationship with its current and likely future urban character and is supported with regard to local visual quality.

8.2 MITIGATION MEASURES

Measure to be incorporated in the development of the project design to mitigate its identified visual have not changed as a result of the changes included in this Modification Application. They include:

- Design principles consistent with the NSW Department Design Guide are to be implemented in design development and implementation to ensure that the building that will result from the proposal presents as an interesting and aesthetically pleasing built element in the landscape.
- Materials and finishes are to be selected to contribute to the overall visual quality of the new building group.
- Existing trees on and adjacent to the site are to be retained and preserved where possible.