Secretary's Environmental Assessment Requirements

Section 78A(8) of the *Environmental Planning and Assessment Act 1979*
Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*

Application Number	SSD 8924
Proposal Name	Sydney Fish Markets – Concept development application and Stage 1 works comprising demolition and early works
Location	1A, 1B & 1C Bridge Road, Glebe, Sydney
Applicant	UrbanGrowth NSW Development Corporation
Date of Issue	22 December 2017
General Requirements	The Environmental Impact Statement (EIS) must address the *Environmental Planning and Assessment Act 1979* and meet the minimum form and content requirements in clauses 6 and 7 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*. Notwithstanding the key issues specified below, the EIS must include an environmental risk assessment to identify the potential environmental impacts associated with the development. Where relevant, the assessment of the key issues as listed below, and any other significant issues identified in the risk assessment, must include: • adequate baseline data • justification of impacts • consideration of potential cumulative impacts due to other development in the vicinity • measures to avoid, minimise and if necessary, offset the predicted impacts, including detailed contingency plans for managing any significant risks to the environment. The EIS must also be accompanied by a report from a qualified quantity surveyor providing: • a detailed calculation of the capital investment value (CIV) of the development (as defined in clause 3 of the Environmental Planning and assessment Regulation 2000), including details of all assumptions and components from which the CIV calculation is derived • an estimate of the jobs that will be created by the development during construction and operation • verification that the CIV was accurate on the date that it was prepared.

Key issues	The EIS must address the following specific matters:
	
	1. Environmental Planning Instruments (EPIs), policies and guidelines
	• The relevant statutory provisions contained within the applicable EPIs and Development Control Plans including:
	  ○ State Environmental Planning Policy (State & Regional Development) 2011
	  ○ State Environmental Planning Policy (State Significant Precincts) 2005
	  ○ State Environmental Planning Policy No. 26 – City West
	  ○ State Environmental Planning Policy (Infrastructure) 2007
	  ○ State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)
	  ○ Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005

	○ Draft State Environmental Planning Policy – Environment ○ Draft State Environmental Planning Policy – Infrastructure ○ Sydney Local Environmental Plan 2012 ○ Sydney Harbour Foreshores and Waterways Area DCP 2005 • The relevant provisions, goals and objectives in the following: ○ *NSW State Priorities* ○ *NSW Planning Guidelines for Walking and Cycling* ○ *Better Placed – An integrated design policy for the built environment of New South Wales* ○ *A Plan for Growing Sydney* ○ *Towards our Greater Sydney 2056* ○ *Draft Eastern City District Plan* ○ *Sustainable Sydney 2030* ○ *Future Transport Strategy 2056* ○ *Sydney City Centre Access Policy* ○ *NSW Freight and Ports Plan 2013* ○ *Sydney's Light Rail Future* ○ *Sydney's Ferry Future* ○ *The Bays Precinct Sydney: Transformation Plan* ○ *NSW Aquifer Interference Policy.* **2. Strategic context and staging** • Consider the proposal in the context of the work being undertaken for the Bays Market District (BMD) nominated as a State Significant Precinct, having regard to the relevant State Significant Precinct Study Requirements for the BMD. • Consider the proposal in the context of the proposed changes to the State Environmental Planning Policy (State & Regional Development) 2011, State Environmental Planning Policy No.26 – City West and Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005 and Draft State Environmental Planning Policy – Environment. • Outline the proposed stages and works of the development during the Stage 1 proposal and Stage 2 proposal. **3. Design excellence** • A design excellence strategy is to be provided which has been prepared in consultation with the NSW Government Architect and the City of Sydney, demonstrating how the Stage 2 proposal will achieve design excellence. **4. Built form and urban design** • Provide an outline of the design process leading to the proposal, including justification of the suitability of the site for the proposed building envelope. • Provide an urban design analysis of the proposed development with reference to the building envelope, height, setbacks, bulk and scale in the context of the immediate locality, the wider area, and the desired future character, including development options for the remainder of the BMD. • Include justification for the height, bulk and scale of the proposed building envelope within the context of the locality, its impacts on amenity, views and vistas, and how it would successfully relate to the existing and future character of the surrounding area, including development options for the remainder of the BMD. • Identify the proposed land uses, including a schedule of gross floor area calculations. **5. Scenic quality and visual impacts** • Provide a detailed justification for the proposed building location in Sydney Harbour (Blackwattle Bay). • Provide an outline of what alternative location options were investigated.

- Provide a detailed Visual Impact Assessment in accordance with the Plans & Documents section. The Visual Impact Assessment must provide a detailed analysis of the proposal's impacts on the scenic quality of the foreshore and justification for these impacts having regard to the unique qualities and natural assets of Sydney Harbour.
- The Visual Impact Assessment must also identify the following:
  - important sight lines and visual connectivity to and through the site
  - visual changes and view impacts of the proposal to/from key vantage points including, but not limited to, Wentworth Park, Anzac Bridge, Bank Street, Blackwattle Bay Park and various locations along the existing and future Sydney Harbour foreshore.

6. Public domain and public access

- Demonstrate how the proposed development will achieve enhanced public access to the site during operation.
- Identify the proposed public domain areas and linkages, including key vehicular, bicycle and pedestrian access points and links to other public domain spaces, including integration with Wentworth Park, Sydney CBD and the existing and future harbour foreshore.

7. Amenity

- Provide a solar access analysis and shadow diagrams outlining impacts on adjoining developments and spaces (including Wentworth Park).
- Identify and assess potential overshadowing, privacy and view impacts.
- Provide a wind impact report that includes the following detail:
  - demonstrate existing wind characteristics of the precinct
  - advice on measures to ensure the suitability of areas for their intended use with regard to the impact of wind on comfort and safety, in particular this is to focus on outdoor public space areas
  - advise on placement, orientation, shape and external design of the building envelope and future wind mitigation devices
  - identify areas surrounding the development that will be wind affected because of the development.

8. Transport, traffic, parking and access

- Prepare a detailed Transport, Traffic and Accessibility Impact Assessment that provides, but is not limited to the following:

<u>Operation</u>

  - definition of study area (agreed by TfNSW and RMS)
  - the adequacy of the existing and future public transport network (including Sydney Metro West and ferry services) to meet the demand of the proposed development, including access and connections to these and proposals for modifications to maintain an acceptable level of access and performance of these networks
  - the current daily and peak hour traffic generation, point-to-point transport, public transport, walking and cycling movements and existing traffic and transport facilities located within the vicinity of the proposed development
  - the estimated traffic generation by heavy vehicles during operation, including forecast movement of heavy vehicles across a 24-hour period (early morning, AM peak, interpeak, PM peak, night) and details of proposed vehicle types
  - the estimated daily and peak hour traffic generation, public transport, walking and cycling trip generation during operation. Trip generation rates are to be agreed by RMS
  - undertake a trip generation survey of the Fish Markets, which is used as one of the tools to forecast the future trip generation of the site
  - develop a traffic model to determine improvements to the road network required to support the proposal (scope, parameters and methodology

	to be agreed with RMS and to be carried out in accordance with *RMS Traffic Modelling Guidelines 2013*) ○ develop an appropriate framework, including potential inputs from strategic modelling to identify and validate required improvements to support the uplift in demand and target behaviours ○ detail the transport infrastructure and servicing improvements including identification of both the land (corridor preservation) and capital components to support the proposal, including staging, costings and delivery and funding responsibilities ○ the existing and future performance of key intersections providing access to the site, and any required upgrades (roads/intersections) ○ an assessment of predicted impacts on road, pedestrians and cyclists and mitigation measures for any safety issues ○ proposed car parking ○ the proposed pedestrian and bicycle routes, including end-of-trip facilities for workers and visitors, as well as measures to maintain road and personal safety in accordance with CPTED principles ○ estimate seasonal peak trip generation, including Christmas, Easter and any other potential events. Outline how these seasonal peaks and potential events will be managed from a transport perspective, including parking management ○ any proposed physical, access, maintenance, operational, urban design and heritage (if applicable) impacts on RMS assets that form part of the proposal must involve consultation with RMS ○ access to and from the site from the road network including intersection locations, design and sight distance (i.e. turning lanes, swept paths, sight distance requirements) ○ proposed access arrangements, including service vehicles, emergency vehicles and loading areas for the development, including management of queueing of service vehicles at peak delivery times. <u>Stage 1 Demolition and Early Works</u> ○ details of construction vehicle routes, truck numbers, peak hour and daily movements, hours of operation, site compound locations, access arrangements and traffic control measures ○ an assessment of demolition impacts on road safety at key intersections and locations for potential pedestrian, vehicle and bicycle conflicts ○ temporary cycling and pedestrian access during demolition/construction ○ detailed plans of the proposed site demolition layout, including access to and from the site from the road network, the internal road network, truck marshalling, turning path diagrams depicting vehicles entering, exiting and manoeuvring through the site, staging, driver facility areas and parking provision on-site ○ preparation of a Construction Pedestrian Traffic Management Plan that includes an assessment of traffic and transport impacts during demolition and early works and how these impacts will be mitigated. **9. Maritime navigation** <u>Operation</u> • Provide a Navigation Impact Assessment (NIA) prepared in consultation with the Harbour Master of the Port Authority of NSW to address the impacts of the proposal on maritime safety, including the navigation of bulk carriers, cruise ships, ferries and commercial/recreational and other maritime vessels, and the implementation of mitigation measures for any safety issues. • The NIA is to consider the proposed developments at Glebe Island at berths 1 and 2 (SSD 8544 and SSD 6708) and cumulative impacts to all maritime users.

	Stage 1 Demolition and Early Works
	• Provide a Navigation Impact Assessment (NIA) to address the impacts of demolition and early works on the navigation of bulk carriers, cruise ships, ferries and commercial/recreational and other maritime vessels, including the implementation of mitigation measures.
	• The NIA is to consider the proposed developments at Glebe Island at berths 1 and 2 (SSD 8544 and SSD 6708) and cumulative impacts to all maritime users.
	
	10. Biodiversity
	• Provide a Marine Ecology Report to identify and determine the impacts to aquatic ecology, including from vessel use during demolition and early works, pile removal, hydrodynamic changes to water circulation and sediment movement, reduced water quality and dredging.
	• Outline the mitigation measures to avoid, reduce, mitigate and offset these impacts, and provide recommendations to increase the aquatic biodiversity value of the urban waterway.
	• Provide a Biodiversity Development Assessment Report (BDAR) prepared in accordance with the Biodiversity Assessment Method to assess the impacts of the proposed development on biodiversity.
	• Include consideration of the relevant policies and guidelines, including the *Policy and Guidelines for Fish Habitat Conservation and Management (2013)*, *DPI Fisheries Threatened Species Assessment Guidelines*, *NSW Biodiversity Offsets Policy for Major Projects – Aquatic Biodiversity Factsheet* and *About Fish Friendly Marine Infrastructure*.
	
	11. Heritage and archaeology
	• Identify if there are any listed or potential heritage items within or near the proposed project area. If any listed or potential heritage items are likely to be affected, a Heritage Impact Statement (HIS) must be prepared in accordance with the guidelines in the NSW Heritage Manual and the following requirements;
	  ○ assess how the development would impact on any places of heritage significance in or surrounding the SSD site and include strategies to minimise or mitigate any impacts on heritance significance.
	  ○ include a visual impact assessment that identifies significant views to and from various vantage points including any SHR item, assess the impact of the proposal on these views and provide recommendations to mitigate these impacts. The assessment should also include photomontages of the site.
	• A historical archaeological assessment should be prepared by a suitably qualified historical archaeologist in accordance with the Heritage Division, Office of Environment and Heritage Guidelines *'Archaeological Assessments' 1996 and 'Assessing Significance for Historical Archaeological Sites and 'Relics' 2009*. This assessment should identify what relics, if any, are likely to be present, assess their significance and consider the impacts from the proposal on this potential resource. Where harm is likely to occur, it is recommended that the significance of the relics be considered in determining an appropriate mitigation strategy. In the event that harm cannot be avoided in whole or part, an appropriate Research Design and Excavation Methodology should also be prepared to guide any proposed excavations.
	• A detailed maritime archaeological assessment should be undertaken by a suitably qualified and experienced maritime archaeologist. This assessment should identify the archaeological potential and significance of maritime heritage sites including shipwrecks, maritime infrastructure, archaeological items and/or relics (both above and below water) that may be impacted by the proposal. The assessment should also include procedures and management strategies for the unexpected discovery of heritage items

	and/or relics. Underwater surveys may also need to be undertaken and may require remote sensing and/or diver based investigations. • Identify and describe the Aboriginal cultural heritage values that exist across the whole area that will be affected by the development. This may include the need for surface survey and test excavation. The identification of cultural heritage values should be guided by the *Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW* (DECCW, 2011) and consultation with OEH regional officers. • Where Aboriginal cultural heritage values are identified, consultation with Aboriginal people must be undertaken and documented in accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW). The significance of cultural heritage values for Aboriginal people who have a cultural association with the land must be documented in the EIS. • Assess and document the impacts on Aboriginal cultural heritage values and demonstrate attempts to avoid impact upon cultural heritage values and identify any conservation outcomes. Where impacts are unavoidable, outline the proposed measures to mitigate impacts. Any objects recorded as part of the assessment must be documented and notified to OEH. **12. Flooding** • The EIS must map the following features relevant to flooding as described in the *NSW Floodplain Development Manual 2005* including o flood prone land o flood planning area, the area below the flood planning level o hydraulic categorisation (floodways and flood storage areas). • The EIS must describe flood assessment and modelling undertaken in determining the design flood levels for events, including a minimum of the 1 in 10 year, 1 in 100 year flood levels and the probable maximum flood, or an equivalent extreme event. • The EIS must model the effect of the proposed development (including fill) on the current flood behaviour for a range of design events as identified above. This includes the 1 in 200 and 1 in 500 year flood events as proxies for assessing sensitivity to an increase in rainfall intensity of flood producing rainfall events due to climate change. • Modelling in the EIS must consider and document: o the impact on existing flood behaviour for a full range of flood events including up to the probable maximum flood o impacts of the development on flood behaviour resulting in detrimental changes in potential flood affection of other developments or land. This may include redirection of flow, flow velocities, flood levels, hazards and hydraulic categories o relevant provisions of the NSW Floodplain Development Manual 2005. • The EIS must assess the impacts on the proposed development on flood behaviour, including: o whether there will be detrimental increases in the potential flood affectation of other properties, assets and infrastructure o consistency with Council floodplain risk management plans o compatibility with the flood hazard of the land o compatibility with the hydraulic functions of flow conveyance in floodways and storage in flood storage areas of the land o whether there will be adverse effect to beneficial inundation of the floodplain environment, on, adjacent to or downstream of the site o whether there will be direct or indirect increase in erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses o any impacts the development may have upon existing community emergency management arrangements for flooding. These matters are to be discussed with the SES and Council

	○ whether the proposal incorporates specific measures to manage risk to life from flood. These matters are to be discussed with the SES and Council ○ emergency management, evacuation and access, and contingency measures for the development considering the full range or flood risk (based upon the probable maximum flood or an equivalent extreme flood event). These matters are to be discussed with and have the support of Council and the SES ○ any impacts the development may have on the social and economic costs to the community as consequence of flooding. • Include consideration of *The City of Sydney Interim Floodplain Management Policy* and *The City of Sydney Blackwattle Bay Flood Study and Floodplain Risk Management Study.* **13. Water quality, soils and contamination** • The EIS must describe the background conditions for any water resource likely to be affected by the development, including: ○ existing surface and groundwater ○ hydrology, including volume, frequency and quality of discharges at proposed intake discharge locations ○ water quality objectives (as endorsed by the NSW Government), including groundwater as appropriate that represent the community's uses and values for the receiving waters ○ indicators and trigger values/criteria for the environmental values identified above in accordance with the ANZECC (2000) Guidelines for Fresh and Marine Quality and/or local objectives, criteria or targets endorsed by the NSW Government. • The EIS must assess the impacts of the demolition and early works on water quality, including: ○ the nature and degree of impact on receiving waters for both surface and groundwater, demonstrating how the development protects the Water Quality Objectives where they are currently being achieved, and contributes towards achievement of the Water Quality Objectives over time where they are currently not being achieved. This should include an assessment of the mitigating effects of proposed stormwater and wastewater management during and after demolition and early works ○ identification of proposed monitoring of quality • The EIS must assess the impacts of the demolition and early works on hydrology, including: ○ water balance, including quantity, quality and source ○ effects to marine waters ○ effects to water-dependent fauna and flora ○ impacts to natural processes and functions ○ mitigating effects of proposed stormwater and wastewater management during and after the works on hydrological attributes such as volumes, flow rates, management methods and re-use options ○ identification of proposed monitoring of hydrological attributes. • Map the following water and soil features: ○ acid sulfate soils (Class 1, 2, 3 or 4 on the Acid Sulfate Soil Planning Map) ○ rivers, streams, wetlands, estuaries (as described in Appendix 2 of the Framework for Biodiversity Assessment - NSW Biodiversity Offsets Policy for Major Projects, OEH 2014) ○ groundwater ○ groundwater dependent ecosystems ○ proposed intake and discharge locations. • Provide detail on how the existing structures will be decommissioned and any hazardous materials likely to be encountered during demolition and

site preparation. Further, how any de-contaminating processes are to be managed during this process.

- Undertake an assessment of contamination of shore-side areas of the site and marine sediments.
- Demonstrate compliance with the requirements of State Environmental Planning Policy 55 – Remediation of Land.

14. Noise and vibration

- Provide a noise and vibration assessment in accordance with the relevant EPA guidelines that addresses the following:
  - the impact of noise and vibration associated with demolition and early works on noise sensitive receivers such as surrounding residences, Sydney Secondary College, Ultimo Public School (temporary relocation site in Wentworth Park) and nearby public reserves
  - the cumulative noise and vibration impacts from concurrent surrounding activities during demolition and early works
  - the cumulative noise and vibration impacts from activities associated with the Stage 2 Main works (SSD 8925)
  - mitigation measures to minimise potential noise and vibration impacts during demolition and early works including recommended standard construction hours and intra-day respite periods for highly intrusive noise generating work)
  - the proposed noise monitoring procedures.

15. Air quality and odour

- Provide an air quality impact assessment to address the impacts of demolition and early works on air quality in accordance with the relevant EPA guidelines.
- Identify the key air emission generating sources and activities from the proposed demolition and early works.
- Identify measures to minimise and mitigate potential air quality, including dust control, and odour impacts on surrounding development.

16. Sediment, erosion and dust controls

- Provide details on the sediment and erosion control and dust control measures during demolition and early works.
- Provide details on the measures and procedures to minimise and manage the generation and off-site transmission of sediment, dust and particles.

17. Waste

- Provide an assessment of the demolition and early works waste impacts and their management, including waste classification in accordance with the EPA guidelines and off-site disposal of concrete waste and rinse water.
- Provide a management plan for the identification, handling, transport and disposal of any acid sulfate soils containing waste that may be encountered during demolition and early works.
- Provide a management plan for the identification, handling, transport and disposal of any asbestos waste and lead-based paint that may be encountered during demolition and early works.

18. Utilities and infrastructure

- Address the existing capacity and any required upgrades of utilities and infrastructure, including staging of infrastructure.

19. Demolition and early works construction impacts

- Provide a Construction Environmental Management Plan for the proposed demolition and early works, that includes the following:
  - community consultation, notification and complaints handling
  - impacts of demolition on adjoining development and proposed measures to mitigate demolition impacts

	○ noise and vibration impacts on and off site ○ air quality impacts on the neighbourhood ○ odour impacts ○ water quality management for the site ○ construction waste classification, transportation and management methods in accordance with DECCW's Know Your Responsibilities: Managing Waste from Construction Sites Guideline. **20. Sea level rise** • Provide an assessment of the risks associated with sea level rise on the development noting the *NSW Government Climate Change Policy Framework* and *NSW Government's Draft Climate Change Fund Strategic Plan and A Plan to Save NSW Energy and Money.* **21. Developer contributions** • Provide the scope of developer contributions proposed. **22. Ecologically Sustainable Development (ESD)** • Provide detail of how best practice ESD principles (as defined in clause 7(4) of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*) will be incorporated in the demolition, early works and ongoing operation phases of the development. **23. Consultation** • Undertake an appropriate level of consultation with Council and State Government agencies.
Consultation	The Applicant must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners. In particular, consultation is required with the following agencies: • City of Sydney Council • NSW Government Architect's Office • NSW Roads and Maritime Services • Transport for NSW • NSW Office of Environment and Heritage • NSW Department of Primary Industries, including Crown Lands and Water Division • Environment Protection Authority • Sydney Water • The Port Authority of NSW, including the Harbour Master • NSW Police • Infrastructure NSW • Department of Education and Principals of Sydney Secondary College and Blackwattle Bay Campus • Local Aboriginal Land Council and stakeholders • Local Heritage Group/s, if relevant • Relevant commercial fishing groups • Relevant recreational groups including fishing, boating, rowing and dragon boating The EIS must describe the consultation process and the issues raised, and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.
Further consultation after 2 years	If you do not lodge a development application and EIS for the development within 2 years of the issue date of these SEARs, you must consult further with the Secretary in relation to the preparation of the EIS.

References	The assessment of the key issues listed above must consider the relevant guidelines, policies, and plans. While not exhaustive, the following attachment contains a list of some of the guidelines, policies, and plans that may be relevant to the environmental assessment of this proposal.

Plans & Documents

Plans and Documents

The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the *Environmental Planning and Assessment Regulation 2000*. These are to be provided as part of the EIS rather than as separate documents.

In addition, the EIS must include the following:

1. **An existing site survey plan** drawn at an appropriate scale illustrating:
   - the location of the land, boundary measurements, area (sqm) and north point
   - the existing levels of the land in relation to buildings and roads
   - location and height of existing structures on the site
   - location and height of adjacent buildings
   - all levels to be to Australian Height Datum (AHD).

2. **A locality/context plan** drawn at an appropriate scale indicating:
   - significant local features such as parks, community facilities and open space and heritage items
   - the location and uses of existing buildings, open space, wharves and employment areas
   - traffic and road patterns, pedestrian and cycle routes and public transport nodes.

3. **Drawings at an appropriate scale** illustrating:
   - plans of the proposed building envelope (at a minimum scale of 1:200)
   - the height (AHD) of the proposed building envelope in relation to the land and any changes that will be made to the level of the land by excavation, reclamation or otherwise
   - the location and uses of existing buildings and structures within the site and surrounding area
   - detailed demolition and early works plans.

4. **Shadow diagrams** showing:
   - overshadowing of the building envelope during the summer solstice (Dec 21), winter solstice (June 21) and the equinox (March 21 and September 21) at 9.00am, 12.00 noon, and 3.00pm.

5. **Visual Impact Assessment**
   - The visual impact assessment, including focal lengths, must be done in accordance with Land and Environment Court principles and is to provide the following information:

<u>Visual assessment methodology</u>

- A flow-chart indicating how the analysis is to be undertaken, or a narrative description of the proposed sequence of activities.
- An explanation and justification for the criteria for assessment relevant to the site, local context and proposed built form and public domain outcomes. Criteria must include reference to the planning framework.
- A definition and explanation of the visual catchment should be defined (see below).
- An assessment matrix including number of viewers, period of view, distance of view, location of viewer to determine potential visual impact - i.e. high, medium or low.

<u>Visual catchment</u>

- Potential visual catchments and view locations, including contours (areas from which the development is visible) are to be identified.
- Categories of views (e.g. from public open space, from key streets, from main

	buildings and from key heritage items) are to be defined. • Photos are required for representative view categories, plotted on a map. <u>Visual material</u> • Reference to be made to site analysis. • Assessment must benchmark against the existing situation with the proposed plans. • Provide key plan indicating where viewpoints are located and narrative explaining why these have been selected. • The built form should be illustrated in the context of the visual catchment to enable assessment of the visual impact. • The location of cross-sections should be clearly shown on a key plan and the choice of positions explained. The cross sections should be shown in the context of the visual catchment and drawn to realistic scales and shown in context. • Vertical exaggeration should provide an accurate rather than 'flattened' impression of buildings in the context of the visual catchment. • Photomontages to be provided for key viewpoints from all directions, and from several positions within the visual catchment. A key plan is to show the locations of these photomontages with supporting documentation to explaining the choice of these locations. Photomontages should be provided for close as well as distant views. A comparison of 'before' and 'proposed' is fundamental to a visual impact assessment, therefore the visual impact assessment (A3 in size) should be undertaken using human eye focal lengths (50mm at 35mm FX format and 46^{o} angle of view) from long range, medium range and short range positions so that they can be assessed with respect to visibility, visual absorption capacity and visual impact rating.
Documents to be submitted	• 1 hard copy and 1 electronic copy of all the documents and plans for review prior to exhibition. • 6 hard copies and 14 electronic copies of the documents and plans (once the application is considered acceptable). Electronic copies of the documentation must be on a USB with documents in PDF format with file sizes not exceeding 5Mb. The hard copies should include plans printed in A3. One additional A1 set of plans may also be provided.