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02 February 2021

Mr Sufian Su' Pat
CTPG
Level 14, Aurora Place
88 Philip Street
Sydney 2000

Dear Sufian,

KAMBALA SCHOOL SSD 10385 – VIA ADDENDUM

This letter has been prepared in response to submissions received for this SSDA which are relevant to views and visual impacts. Following exhibition of the VIA both Woollahra Council and the DPIE requested clarifications and further information in relation to some aspects of the VIA prepared by Urbis and Views Analysis Report prepared by RLA (VAR). This letter addresses all issues relevant to views and visual impacts.

The VIA prepared by Urbis is based on guidance provided by Dr Richard Lamb in the Public Domain Views Analysis Report prepared by RLA April 2020. This report identifies important public domain views and includes a review of those identified in Woollahra Council DCP and analyses the visual exposure of the subject site and likely visual effects (visibility of) the proposed development.

SPECIFIC RESPONSES

Issue/Comment

The Visual Assessment Reports by Richard Lamb and Associates and Urbis selected views from New South Head Road, Bayview Hill Road, Towns Road and Tivoli Avenue.

There are inconsistencies between the values attributed to the assessed views. In particular, the RLA report states that view impacts to views 6, 9, 10, 15 and 16 would be 'high' and at View 5 the proposal would have 'medium' view impacts.

The impacts are described in the Urbis Report as 'acceptable' on the basis that the view impacts of the proposed development from close locations would be lower than the approved development for a music building (DA 387/2005/1).

Urbis Response

The methodology used and description of weighting criteria are included in the Urbis VIA. The methodology has been developed over a long period of time by Dr Lamb and is widely accepted in NSW development assessment as being objective, robust and logical in relation to visual impact assessment. The method adopts basic principles included in other VIA methods but is more comprehensive in our opinion than others that are routinely used for assessment including;

- Guidelines for Landscape and Visual Impacts Assessment 3rd edition, published by the Landscape Institute and Institute of Environmental Management and Assessment (**GLVIA**)
- Guideline for landscape character and visual impact assessment, Environmental Impact Assessment practice note EIA - NO4 prepared by the Roads and Maritime Services December 2018 (**RMS LCIA**).

It should be noted that as per the methodology used, the RLA views analysis report does not assess visual impacts. The RLA report refers to the 'external visibility' of the subject site and the **visual effects** as modelled of the proposed development from identified and important view places. The visual effects of the proposed development (that is, how much of the built form proposed is visible) is rated for each photomontage. The determination of the final level of visual impacts is not included in the RLA report.

The determination of visual impacts is included in the Urbis report and is based a methodology which applies 'weighting criteria' to the level of visual effects to arrive at a final rating of visual impact. The impacts described in the Urbis report are based the application of relevant factors such as physical absorption capacity, compatibility with the approved development envelope and features including heritage items and compliance with relevant planning controls. Please refer to the full VIA for further information regarding the VIA methodology.

Therefore high visibility (as rated by RLA) does not necessarily equate to a high visual impact (as determined by Urbis). In this regard the ratings attributed in the RLA report are not inconsistent and do not conflict with visual impact ratings made by Urbis included in the Visual Impact Assessment. Ratings in the RLA report are consistent with visual effects ratings and final visual impacts rating as shown on each photomontage view page in the Urbis VIA report.

Further, the RLA report concludes that views to scenic and other items beyond the site would generally be unaffected. The RLA report also identified that the approved DA (but not constructed development) would have more effect on view compositions and visibility than the proposal in some cases. The findings regarding visual effects are not in consistent with the VIA whereby it concludes that the development is considered compatible with the surrounding urban environment and generates low to moderate visual impacts in some views.

Issue/Comment

Section B1.9 of the Woollahra DCP 2015 identifies significant views and vistas across the Rose Bay Precinct. The views from Towns Street and New south Head Road towards Sydney Harbour are relevant to this proposal and have not been addressed. It is unclear which assessed view is equivalent to the DCP view corridor from Towns Road. It is recommended that further information is requested by DPIE in relation to this issue in order to carry out a proper assessment.

Urbis Response

Urbis inspected all view places and views identified within the Woollahra DCP, in particular the views from Towns Road and New South Head Road as shown on Woollahra DCP 2015 B1.9, Map 9 Significant views and vistas map (DCP map). The views that are documented and modelled in the VIA reflect as closely as possible those identified on the DCP map.

Upon inspection, it was identified that the site and proposed development are not visible from the DCP view place in Towns Road which is shown to emanate from the east and upper end of Towns Road near its intersection and Old South Head Road.

The subject site is not visible from the upper part of Towns Road in a down-hill north-westerly view corridor along Towns Road. Therefore the potential Towns Road view corridor was inspected from a closer location at its intersection with Chamberlain Avenue. This view is included at **View 23 (pp. 9)** in the Visual Impact Assessment. There is low external visibility of the subject site from this location due to the blocking effects of street tree vegetation and existing development located along the south side of the road. In this regard this view was not selected by Dr Lamb or Urbis for further analysis or modelling.

For completeness a view adjacent to the intersection of Towns Road and New South Head Road was inspected and modelled to show the visual effects of the proposed development in a close public domain view designed to replicate a potential view from the 'arrow-head' of the DCP view (photomontage location 7) an additional and closer view that includes a similar location as is available from the west end of Towns Road is shown in photomontage 16.

Photomontage View 7 (pp. 27) is from close to the DCP arrow-head location in Towns Road. Our version of this view includes a south-west orientation from the south-east footpath at the intersection of Towns Road and New South Head road. The modelling indicates that the majority of the proposed built form proposed (shown in grey) sits below the road level and is of low external visibility. At page 19, in the RLA views Dr Lamb comments that

View 7

"The view is taken from an elevated level at the intersection with Towns Road. The proposed development would be of low visual exposure and would have no significant effect on access to views beyond the site".

Visual impacts of the proposed development on view 7 are described and rated at page 26 of the Urbis VIA and taking all things into consideration are rated as 'low visual impact'.

Other views identified on the DCP map as a 3-pronged arrow emanating from New South Head Road corridor south of Towns Road were also approximately located, inspected, documented and selected for modelling and are shown in photomontages 6 and 15 included at pages 24 and 36 of the VIA. All DCP views are discussed in section 3.5.1 of the Urbis VIA report.

In addition View 5 (pp. 23) (view south-west from the footpath near the intersection of Bay View Hill Road and New South Head Road) is also equivalent to a significant view stated within the DCP.

In this regard all mapped DCP views were inspected and analysed in relation to the likely visual effects that would be generated by the proposed development. 12 photomontages were prepared to inform the assessment of visual impacts for this SSDA. Five views out of 12 public views, including photomontages 5, 6, 7, 15 and 16 were used as a basis to inform the assessment of visual impacts of the built form proposed on DCP views.

In our opinion therefore the visual impacts of the proposed development on DCP views has been adequately addressed.

Issue/Comment

The proposed bulk and scale at view locations 5, 6, 15 and 16 would largely block the existing views from New South Head Road to the Tivoli Heritage Building. Views 6 and 15 are in similar locations/equivalent to the identified views by Woollahra DCP 2015 B1.9. According to the DCP, these are 'significant' views and vistas. The proposal has high visual impacts on the public views achieved from these locations, eliminating the visibility of the heritage building when viewed from New South Head Road. This is inconsistent with the provisions of the Woollahra DCP.

Urbis Response

The proposed bulk and scale of the built form proposed at view locations 5, 6, 15 and 16 **does not significantly block or eliminate access to views of Tivoli House** including to the majority of its western and northern facades, its upper storey gables and distinctive roof form. In such close views the built form proposed (as shown by the grey colour in photomontages) rises to a low level blocking only part of the ground floor façade of Tivoli House. We comment further that in relation to close views as modelled that;

The proposed development is lower in elevation, of less bulk and scale compared to the approved DA. It will introduce a new foreground element into the lower parts of some close views.

- The trailing edge of the proposed built form, sports surface and semi-translucent fence will block the lower part of Tivoli House.
- The distinctive roof form and gables of Tivoli House are unaffected by the proposed development and will remain visible in all close and distant views.

The low level of visual effects and low external visibility of the proposed development (as modelled) will not significantly block views to the majority of Tivoli House.

The yellow mass included in the photomontages represents the approved DA (which will not be constructed) and which creates a higher level of blocking in DCP views. This has been used for comparative purposes to demonstrate that the view sharing outcomes of the proposed development generate a lower level of visual effects and lower over all visual impacts on important public and mapped DCP views. The grey block representing the proposed development does not eliminate any access to the DCP views. The proposed development blocks lower parts of Tivoli House leaving the majority of Tivoli House its upper storey, distinctive roof form and views to Rose Bay available in DCP and public views.

Issue/Comment

Insufficient details of the infrastructure/amenities requirements such as lighting, furniture, nets and fencing that would be required to service sporting facilities of this nature have been provided. This may further impact upon significant views. Details are required to enable a proper assessment.

Urbis Response

The VIA has addressed the amenities required to service the sporting facilities and their visual impacts on significant views. The photomontages include the fences posts and light poles. The fence infills use a mesh that will appear as a semi-transparent material. Further details will be provided by others. Light poles in the photomontages are visible as narrow slim structures widely spaced between the semi-translucent fencing material, the visual effects of which as modelled, are minor. The design and

materiality of the sports fencing will facilitate the visibility of Tivoli House and reduce potential visual impacts on such views. Sports facilities features have been modelled in photomontages **View 4, 5 and 6** in the VIA.

In our opinion the inclusion of the sports facility fencing forms etc in photomontages has allowed their visual impacts to be adequately considered and addressed.

Issue/Comment

Building Height

Under the Woollahra LEP 2014, the maximum permissible height on the subject site is 9.5 metres. According to the Cl. 4.6 report prepared by Ethos Urban, the proposal seeks a maximum height of 12.5 metres, three (3) metres higher than the LEP height limit.

The height non-compliance would result in unacceptable visual impacts on the existing public domain views as discussed previously. A proposal which complies with the height control would maintain higher visibility to the precinct's heritage building/site and would result in less impacts on the quality of the existing views.

Urbis Response

We note that height controls included in the Woollahra LEP 2014 (the LEP) are not applicable to this assessment. Notwithstanding for completeness we have considered the compliance of the built form proposed in relation to the LEP height control, height being the control most relevant to visual effects and impacts. We have reviewed architectural plans prepared by AJ+C architects which show the LEP height control in a dotted blue line applied to various elevations for example drawings SK3101,3102 and 3103. We note that access to views of entire building facades as shown in elevations will not actually be available in the public domain but would be constrained to views from within the school grounds if in fact they are available given the location of existing and intervening buildings on the site. In other words the extent of the elevations as shown in the drawing package will not be externally visible.

All parts of the music building as shown in east and south elevations sit below or significantly below the height plane of 9.5m above natural ground. The north elevation shows that a minor amount of semi-translucent sports fencing and the upper part of two fence poles will sit above the LEP height control. The west elevation shows that the sports field surface structure, fencing and light poles sit above the height control. We comment that the solid and potentially most visible part of the built form proposed being the playing surface structure is a low horizontal form which sits well below the height of the New South Head Road carriageway, broadly at the height of the control. This form, the fencing structures and light poles will generate low levels of visual effects and minor visual impacts in downward views where they may be visible.

All parts of the sports building as shown in the north and west elevations sit significantly below the LEP height control except for a part fence panel and one (western-most) fence post which in our opinion generate negligible visual effects and minor visual impacts. The sports building south elevation shows that a short vertical section of a glass clad lift at the east end of the music building, will sit above the LEP height control. In addition a narrow horizontal section of sports fencing at the west end of the sports building including fencing material and fence posts will sit partially above the height control line. The form, height and materiality of the structures of the fencing structure and panels, light

poles and single vertical section of glass lift that will sit above the height control will not generate any significant visual effects or impacts on public domain views.

In our opinion, the minor extent and nature of non-compliances with the controls does not increase the significance of the visual effects and therefore does not create an upweight in the overall ratings of visual impacts.

GENERAL COMMENTS

Use of the 3D model of the approved development for comparison of visual effects

Urbis inspected all public domain views and view places with RLA and selected photographs from each of those view places to be prepared as photomontages. The photomontages prepared include an Architectural 3D model of the built forms proposed (shown in a light grey colour block). For comparison the photomontages also include a 3D architectural model of a previously approved DA (shown as a yellow block). The inclusion of the previously approved development as shown in yellow is to demonstrate that a taller, bulkier development as approved could be constructed on the site.

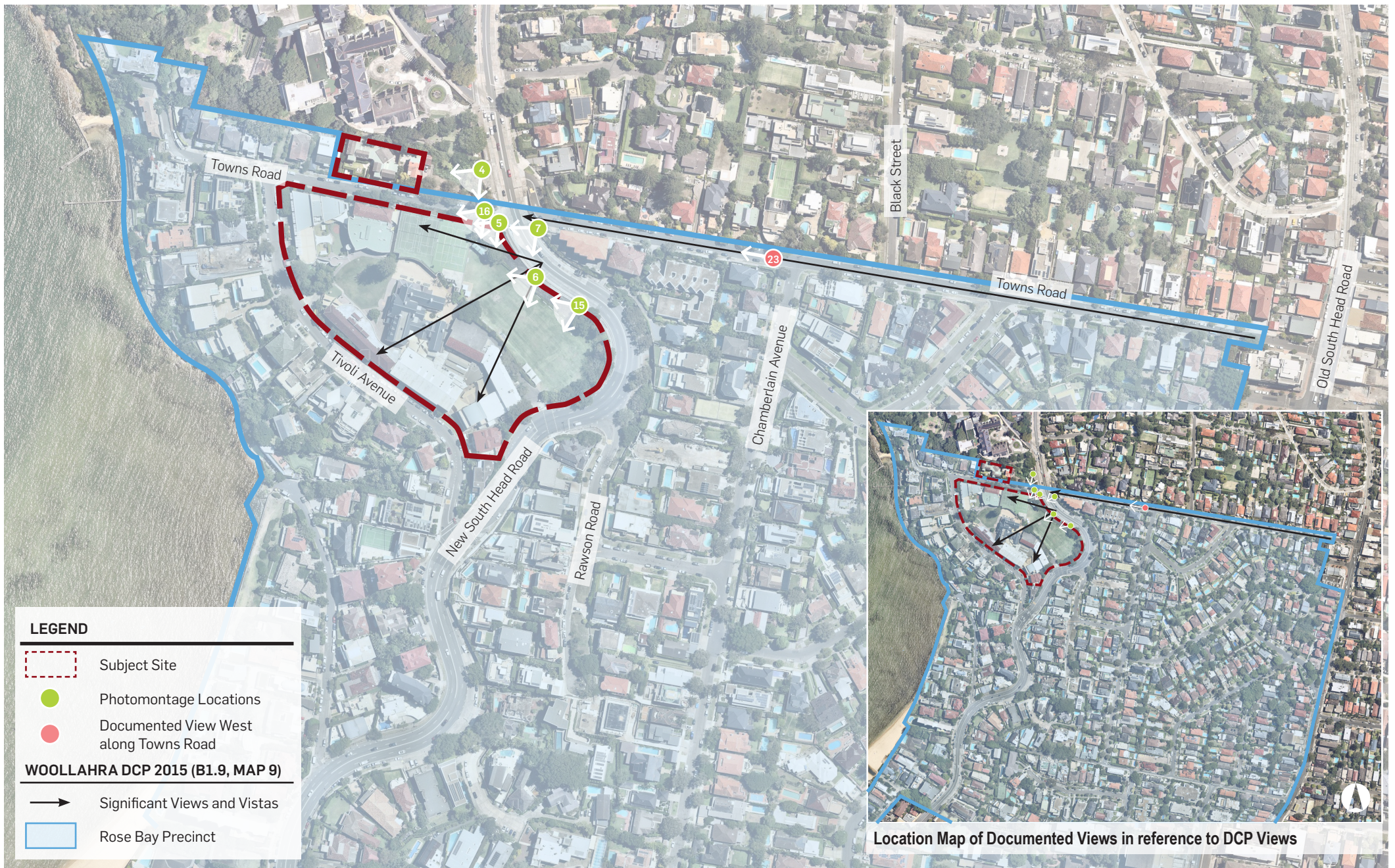
In all views the approved taller, bulkier development is more visible ie creates a higher level of visual effects compared to the proposed development. The high level of external visibility and view blocking created by the approved development for example blocking a larger amount of the Tivoli House in public views is shown in photomontages 4, 5 and 6 from New South Head Road. In all cases the proposed development as modelled in grey creates a lower level of visual effects and when all relevant factors are considered a lower level of visual impacts on public domain views.

The ratings included in the Urbis VIA remain accurate and relevant and adequately address all concerns. In our opinion the proposed development can be supported on visual impacts grounds.

Kind regards,

A handwritten signature in black ink, appearing to read "Jane Maze-Riley".

Jane Maze-Riley
Associate Director National Design





Urbis View 23 (Page 9 VIA report)

A view west along Towns Road towards the Harbour and Sydney Opera House from the intersection of Chamberlain Avenue. This view is approximately equivalent to the DCP view along Towns Road. Views were inspected further south and higher up Towns Avenue from which the subject site is not visible.



LEGEND

- Subject Site
- Photomontage Locations
- Documented View West along Towns Road

WOOLLAHRA DCP 2015 (B1.9, MAP 9)

- Significant Views and Vistas
- Rose Bay Precinct

VIEW OF PROPOSED

- Existing Approved DA
- Proposed SSD DA

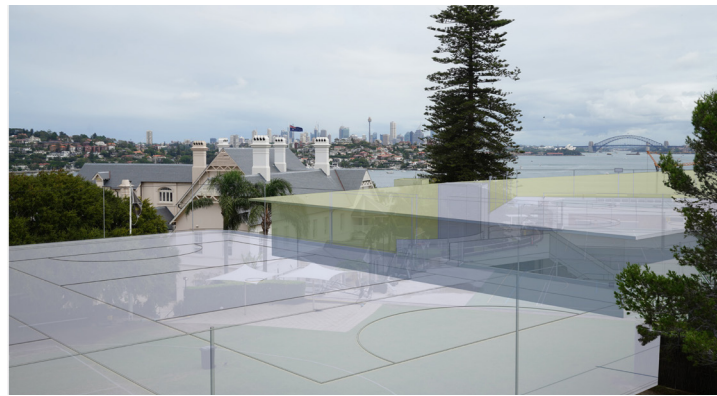
Location Map of Documented Views in reference to DCP Views



Urbis View 04 (Page 20-21 VIA Report)
View south-west from Forsyth Park towards the school



Urbis View 05 (Page 22-23 VIA Report)
View south-west from footpath near intersection of Bay View Hill Road & New South Head Road



Urbis View 06 (Page 24-25 VIA Report)
View south-west from footpath along New South Head Road adjacent to Kambala School sporting fields



KAMBALA - VISUAL IMPACT ANALYSIS

EXISTING MODELLED VIEW LOCATIONS

DATE: 02.02.2021
JOB NO: P0020764
DWG NO: -
REV: A



Location Map of Documented Views in reference to DCP Views

LEGEND

- Subject Site
- Photomontage Locations
- Documented View West along Towns Road

WOOLLAHRA DCP 2015 (B1.9, MAP 9)

- Significant Views and Vistas
- Rose Bay Precinct

VIEW OF PROPOSED

- Existing Approved DA
- Proposed SSD DA



Urbis View 07 (Page 26-27 VIA Report)
View south-west from footpath at the corner of Towns Road, parallel to New South Head Road



Urbis View 15 (Page 36-37 VIA Report)
Harbour view south-west from footpath along New South Head Road adjacent to Kambala School sporting fields



Urbis View 16 (Page 38-39 VIA Report)
Rose Bay view looking south-west from footpath along Bayview Hill Road adjacent to Kambala School Sporting Fields



KAMBALA - VISUAL IMPACT ANALYSIS

EXISTING MODELLED VIEW LOCATIONS

DATE: 02.02.2021
JOB NO: P0020764
DWG NO: -
REV: A