

Our Reference 141219

3 September, 2020

Bloompark Consulting Pty Ltd
Suite 2.04/41 McLaren Street
North Sydney
NSW 2060

Client:
Trinity Grammar School

email; pbrogan@bloompark.com.au

Dear Sirs,

Response to Submissions Trinity Grammar School SSD 10371

Built form and Heritage

I refer to the above matter and to the submission from the Department of Planning, Industry and Environment in response to exhibition of the proposal. As you will be aware, Richard Lamb and Associates (RLA) prepared the Visual Impact Assessment for SSD_10371.

In relation to Built Form and Heritage, the Department's Report raised two matters that are of relevant to visual impacts, as follows:

- *The majority of the new buildings are located within the SP2 zone under the Ashfield Local Environmental Plan 2013. While there is not stipulated height limit within the SP2 zone, the five-storey built form at the centre of the site appears to be bulky and would adversely impact on existing views currently enjoyed by the neighbours.*
- *While the impacts of the development on the views enjoyed by the neighbours is assessed as low to moderate, the Department considers that design options should be explored to reduce the overall height and bulk of the five-storey built form. This may involve reducing or relocating the extent of program accommodated by the new teaching and learning and performing arts buildings and/or further articulation of envelopes and facades.*

RLA have considered these two aspects of the Department's submission and have the following comments to make.

1 Impacts on neighbours' views

Both of the matters raised that are relevant to visual impact cite the Department's concern that the buildings proposed would adversely impact on existing views currently enjoyed by the neighbours. We consider that this concern is not justified, based on the findings of the RLA Visual Impact Assessment and a review of those findings in response to the Department's submission.

RLA undertook a detailed assessment of the visual catchment of the site, which is small, constrained to the local scale and the immediate locality and characterised by one to two-storey residential development or parkland, from which views can be experienced. The finding that impacts on the neighbours would range from low to moderate was based on a methodical, detailed and systematic analysis of visual effects and impacts.

RLA in the Visual Impact Assessment undertook a detailed Visual Effects Analysis (Chapter 3), including analysis of the visual catchment (private and public views), visual character, scenic quality, view place and viewer sensitivity (this is sensitivity to public and private views) and an analysis of likely private domain (neighbours') views. In Chapter 3.2, the effects of variable visual effects factors were analysed, with detailed consideration of impacts on neighbours' views under every criterion, including view sharing or view blocking. The overall extent of visual effects of the proposed development (Chapter 3.2.5) were assessed as low. The visibility of the change proposed caused higher visual effects isolated to view places in Victoria and Seaview Streets. A detailed assessment in relation to view sharing implementing the planning principles in *Tenacity* (private views) and *Rose Bay Marina* (public views) was undertaken in Chapter 3.2.6 and concluded in relation to private views, that *Tenacity* had no work to do, as significant view loss would not occur and in relation to *Rose Bay Marina*, that the proposal would not block or devalue significant views.

The RLA Visual Impact Assessment in Chapter 4 provides a detailed visual impact analysis with weightings to establish the significance of impacts, including public and private domain sensitivity, acknowledging the heritage significance of the adjacent residential area and the school itself. Chapter 4.2.1.2 notes that views affected by the do not include scenic or individual heritage or their settings that are likely to be natively affected by the proposed development. The height and bulk of the proposal has been taken into account at every level of the RLA methodology. The overall visual impacts were found to be low.

The assessment in the RAL Visual Impact Assessment is supported by a series of photomontages certified for accuracy, prepared by Digital Line, expert architectural illustrators. These show a representative range of views of the proposal including views from the neighbourhood visual catchment. These photomontages represent the likely appearance of the proposal, accurately. It is evident from the comparison of the existing views to the proposed views in the photomontages, that the proposed development does not cause significant impacts on the availability of views, block, compete with, or diminish views of scenic features beyond the site.

In other words, while the new buildings would clearly make a qualitative change to the appearance of the site and setting, among others by unifying the architectural treatments and materiality of the views from the visual catchment, the proposal does not result in significant visual impacts such as impacts on access to views of scenic or culturally significant items or on view sharing.

The RLA Visual Impact Assessment shows that the proposed development has low impacts, acknowledging the fact of change to the appearance of the site as the prime cause of moderate impacts on isolated locations with direct views from near the boundaries. This is a conservative assessment, because on most other criteria in the assessment, which is very detailed and carefully explained, the proposal has low effects and low impacts. In addition, the existing situation, with built development widely separated from residential viewers and substantially screened by proposed landscape, would be retained, as would the visual character and scenic quality, as intended. This is evident in the certified photomontages.

We note that the Department does not take issue with the quantitative findings of the Visual Impact Assessment (i.e. that visual impacts would be low or at the most, moderate), but instead appears to have concerns about the appearance of the buildings, as regards bulk. In our opinion, this is not primarily a visual impact issue, but a subjective opinion on the proposal, on architectural and urban design grounds.

Having reviewed the concern expressed by the Department in relation to visual impacts on views from the neighbours, we concluded that these have been adequately addressed in the RLA Visual Impact Assessment and that there was no justification for further work to be undertaken in that regard.

2 Bulk and height of buildings

Both of the matters raised cite the Department's concern with the height and bulk of the buildings. As noted above, the height and bulk of the building do not cause any specific visual impacts. They are simply quantitative criteria of the height and volume of the proposal. The second of the matters raised by the Department suggests that design options be explored to reduce height and bulk of the five-storey built form and/or further articulation of envelopes and facades. These are also matters of architecture, building programming and urban design, on which we have no comment, as these are for those with appropriate expertise to address.

While we don't agree that the proposed buildings are too bulky or too high, from a visual impact standpoint, there is the potential to reduce the height, the apparent bulk of the buildings and increase articulation. The project architects in Response to Submissions have undertaken a review of the buildings' program, heights, bulk and scale to address the Department's concerns.

The potential changes proposed are:

- Reduction in height of the Level 5 roof of the Teaching and Learning Block by 500mm and of its mechanic enclosure by 400mm.
 - The original proposed RL to the top of the Teaching and Learning Block was RL69.30. The proposed amended design drops the level to RL68.80.
 - The original proposed Mechanical Plant enclosure was RL68.60 and is now proposed at RL68.20.
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The model of the modified proposal was provided by Digital Line, who with the assistance of the project architects have prepared photomontages showing views from the public domain in Victoria Street at view points V3 (adjacent to 153 Victoria Street) and V4 (the intersection of Victoria Street and Holwood Avenue). These representative photomontages showing the effect of the potential modifications are attached to this letter. The assumptions and methodology of preparation of the photomontages do not vary from the same parameters for preparation of the photomontages in the RLA Visual Impact Assessment. We can therefore certify that the photomontages of the proposed modified design can be relied on as accurate.

Analysis of visual effects of proposed modifications

Three views are shown for each of the view positions, being:

- the existing application;
- the proposed modified design; and:
- comparison graphic. This shows the proposed modified design, over which has been drawn the roof line of the existing application, as a dashed, red line.
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Position V3: Victoria Street adjacent to No.153

Existing Application

The photomontage of the existing application is shown at Page 60 of the RLA Visual Impact Assessment.

Proposed modified design

The proposed modified design is better articulated as a result of the lowering of the roof level. The bulk of the upper level is reduced.

The character, quality, materiality and general appearance of the development remains the same.

Comparison graphic

The comparison graphic shows the roof line of the existing application as a red, dashed, line, in comparison with the proposed modified design.

Position V4

Existing Application

The photomontage of the existing application is shown at Page 61 of the RLA Visual Impact Assessment.

Proposed modified design

The proposed modified design is better articulated as a result of the lowering of the roof level. The bulk of the upper level is reduced.

The character, quality, materiality and general appearance of the development remains the same.

Comparison graphic

The comparison graphic shows the roof line of the existing application as a red, dashed, line, in comparison with the proposed modified design.

Summary in relation to proposed reduced bulk and scale

The proposed modified design is subtly but detectably different from the existing application, with reduced bulk at the upper level, reduced height and greater articulation.

As noted earlier, we don't consider that the height or bulk of the existing application are excessive, nor that there would be significant impacts on views from the neighbours. The reduction in height does not provide better views of any items beyond the site.

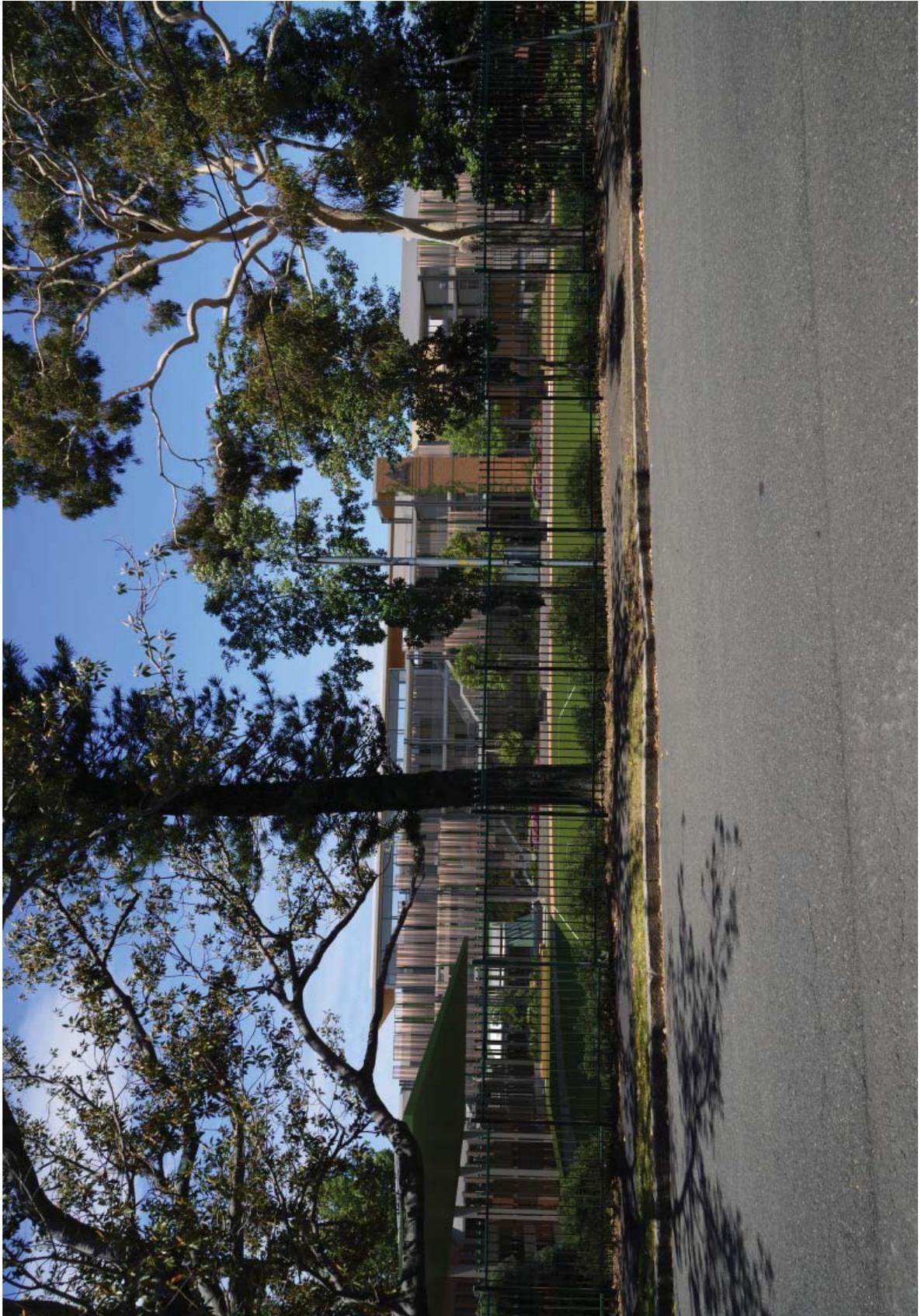
However, the proposed modification do provide a perceivable reduction in bulk of the upper levels of the development and a minor improvement to the apparent articulation of the proposal on either side of the lift core.

Please do not hesitate to call us if there are any questions or clarifications needed, or if we have misinterpreted any of the requirements.

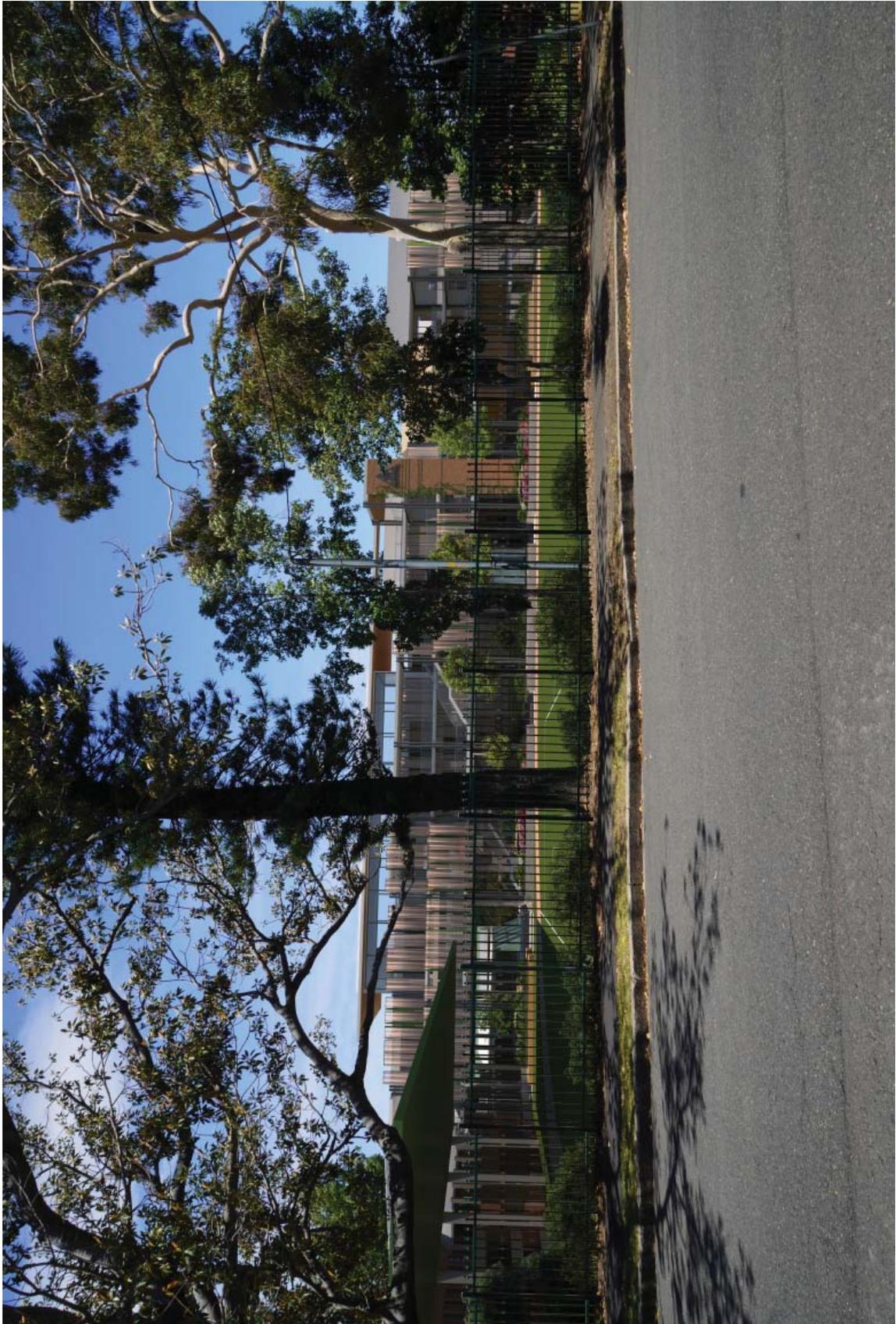
Yours sincerely

Dr Richard Lamb

Richard Lamb & Associates



VP3 View east from adjacent to 153 Victoria Street Existing application



VP3 View east from adjacent to 153 Victoria Street Proposed modification



VP3 View east from adjacent to 153 Victoria Street Comparison graphic



VP4 View north-east from the corner of Holwood Avenue and Victoria Street Existing application



VP4 View north-east from the corner of Holwood Avenue and Victoria Street Proposed modification



VP4 View north-east from the corner of Holwood Avenue and Victoria Street Comparison graphic

Summary Curriculum Vitae: Dr Richard Lamb



Summary

- Qualifications
 - Bachelor of Science - First Class Honours, University of New England in 1969
 - Doctor of Philosophy, University of New England in 1975
- Employment history
 - Tutor and teaching fellow – University of New England School of Botany 1969-1974
 - Lecturer, Ecology and environmental biology, School of Life Sciences, NSW Institute of Technology (UTS) 1975-1979
 - Senior lecturer in Landscape Architecture, Architecture and Heritage Conservation in the Faculty of Architecture, Design and Planning at the University of Sydney 1980-2009
 - Director of Master of Heritage Conservation Program, University of Sydney, 1998-2006
 - Principal and Director, Richard Lamb and Associates, 1989-2019
- Teaching and research experience
 - visual perception and cognition
 - aesthetic assessment and landscape assessment
 - interpretation of heritage items and places
 - cultural transformations of environments
 - conservation methods and practices
- Academic supervision
 - Undergraduate honours, dissertations and research reports
 - Master and PhD candidates: heritage conservation and environment/behaviour studies
- Professional capability
 - Consultant specialising in visual and heritage impacts assessment
 - 30 year's experience in teaching and research on environmental assessment and visual impact assessment.
 - Provides professional services, expert advice and landscape and aesthetic assessments in many different contexts
 - Specialist in documentation and analysis of view loss and view sharing
 - Provides expert advice, testimony and evidence to the Land and Environment Court of NSW on visual contentions in various classes of litigation.
 - Secondary specialisation in matters of landscape heritage, heritage impacts and heritage view studies
 - Appearances in over 275 Land and Environment Court of New South Wales cases, submissions to Commissions of Inquiry and the principal consultant for over 1000 individual consultancies concerning view loss, view sharing, visual impacts and landscape heritage

A full CV can be viewed on the Richard Lamb and Associates website at www.richardlamb.com.au