



## **s.75W Application to vary Concept Approval for MOD2**

### **Major Project MP09\_216**

### **Proposed Envelope for stage A**

### **8 Parsonage Street, Shepherds Bay**

## **Views loss assessment report**

### **1 Background**

RLA has been engaged by Holdmark to undertake an analysis of effects of a proposed amended building envelope on views and view loss at the precinct referred to as Shepherds Bay. Our analysis forms part of a s.75W application to the NSW Department of Planning & Environment (DPE) prepared by City Plan Strategy and Development for the proponents, Holdmark.

The original Concept Approval for the precinct is known as MP09\_216. The concept approval was issued by the NSW Planning Assessment Commission (PAC) on 6 March 2013 and modified on 16 October 2014 (MOD 1) and 16 January 2017 (MOD 2).

The NSW Department of Planning & Environment (DP&E) recommended 15-storeys in the assessment of both the original Concept Plan assessment, as well as MOD 2. This proposal responds to this by seeking to increase the envelope of Stage A approved in MOD 2 from 10 storeys to 15 storeys. The existing dwelling cap, parking cap, and commercial floor space cap are not proposed to be amended.

As noted by City Plan in the Environmental Assessment for this s.75W application to vary MOD2, Stage A has been subject to a design excellence competition, as well as a design integrity panel, following after the competition, in response to Condition 1 of Schedule 3 of the Concept Approval, which requires that any DA for Stage 1 must achieve design excellence. As part of conducting the competition and the integrity panel, both entrants and experts concluded that design excellence cannot be delivered in a 10-storey envelope. The 10-storey envelope referred to is a feature of the original Concept Approval, as well as the modified envelope as part of MOD 2.

We previously prepared a views analysis report for the 24-storey envelope for Stage A that was modified in the approval for MOD 2 by the Planning Assessment Commission (PAC),



which adopted the new site layout compared to the Concept Approval, but constrained the height of the tower component of the building to 10 storeys.

We considered the smaller footprints, lower podium and public domain outcome of the previously proposed s.75W application of 24 storeys in height to be meritorious with regard to visual character and benign with regard to impacts on views, in relation to the Concept Approval, or the MOD 1 consent.

MOD 2, as amended, appears to have adopted the benefits of the new layout at the streetscape, including the clear public domain benefits, while reducing the GFA by nearly 20%.

The proposal in the s.75W is for an intermediate height tower with the same floor plate and podium height, that largely regains the GFA lost in the MOD 2 determination, compared to the Concept Approval. The merits or otherwise of the GFA are for others with appropriate expertise to address.

Our analysis therefore, considers specifically the effects on views and on potential view loss as a result of the proposed taller tower element in the current s.75W application. At the outset we can say that we support the lower tower now proposed in the s.75W application, which is sufficient to create visual interest, definition and identity for the landmark site it occupies. As we considered the taller 24-storey tower on the same floor plate to be acceptable with regard to view loss, it follows that the intermediate height now proposed is unlikely to cause any significant impacts in that regard. To be clear, the s.75W application is different from the MOD 2 approved envelope with regard to the height of the tower, only. The podium remains unchanged. View impacts, if any, would therefore be limited to the taller tower.

## **2 Purpose of this report**

RLA are specialists in visual analysis and visual impact assessment of projects ranging from individual residences to urban release areas. The company specialises in landscape assessment, landscape heritage conservation, assessment of visual impacts and strategic planning. Dr. Lamb, the author of this report, has 25 years' experience in development assessment, landscape assessment and landscape management. RLA have been engaged to provide independent visual analysis of many Major Projects, State Significant Developments, planning proposals and development applications in urban settings similar to the subject site (the site). RLA were principal visual consultants to Holdmark for the original Concept Plan for the Shepherds Bay urban activation precinct.

This report is an analysis of the potential impacts on views and view sharing that would arise from construction of the proposed s.75W application to vary the Concept Approval as modified by MOD 2 for Stage A of the project at Shepherds Bay on the subject site at 8 Parsonage Street, Ryde.

This report analyses and assesses the likely impact on scenic character of the setting and on the sharing of views from the public and private domain that would be caused by construction of a 15-storey tower element for the building on the subject site, adopting the same floor plate and podium approved in MOD 2. The report is based on an analysis of block model photomontages comparing the Concept Approval, MOD 2 and proposed s.75W envelope and Development Application (DA) massing. Block model photomontages were prepared by Cox and Kennedy Associates Architects under our direction, as shown in the Views Analysis, 8



Parsonage Street, Shepherds Bay (hereafter called the Views Analysis). The Views Analysis was prepared to represent the full range of potentially affected viewing locations and has been updated to be faithful to the emerging character of the setting of the proposed building, which includes newly constructed development to the north and west, but not directly adjacent to the subject site.

### **3 Massing of the s.75W and DA proposal**

The proposal is to amend the existing approved envelope of the MOD 2 building located at 8 Parsonage Street, in Shepherd's Bay. The Concept Approval envelope is a podium/tower form building with a two-level commercial height podium across most of the site and two squat towers elongated north-south, with a narrow corridor between them. The lower of the two towers is parallel to Church Street.

The competition winning building is massed into three separate components, two of which appear to have a two-level commercial/retail component as in the podium of the approved envelope, with residential levels above. The podium-tower form has been changed to a slim tower typology with a partial podium on the north-west side. The tower has been placed toward the east side of the site and closer to Church Street than the taller of the two squat towers in the Concept Approval scheme. A ground level plaza is proposed for most of the east side of the subject site off Porter and Parsonage Streets.

The potential public domain benefits of the competition winning scheme, plaza and interfaces to the surrounding streets are very substantial benefits compared to what could be provided in the Concept Approval.

The s.75W building envelope and DA massing design has the same components as the MOD 2 approved scheme, with extra height proposed overall in the slim, tower component, which has the same floor plate as approved in MOD 2. There are significant public domain, amenity and sunlight availability benefits of this modification to the proposed plaza, Well Street and immediate streetscape of Parsonage Street compared to MOD 1. The urban design merits of the proposed envelopes in detail and issues in relation to GFA, other than the appearance and character of the building, are for others to address.

### **4 The site and surrounding visual context**

The Meadowbank development precinct is located at the interface and at an entry point to two major municipal areas of Sydney and has high external visibility. The Stage A building is located west of Church Street, surrounded by The Loop Road and Well Street to the north-east and is adjacent to the Paramatta River foreshore open space and north-east of the Ryde Bridge. It is surrounded to the north-west and north by contemporary residential flat buildings which are predominantly 5 to 7 residential storeys in height.

The subject site is situated on a rocky promontory on the north-east side of the river, from which the revetments of the Ryde Bridge spring. Any building on the site would be exposed to an extensive visual catchment, including the Parramatta River corridor and areas north and south of this. The topography north of the river rises relatively steeply to the ridge along which Victoria Road passes, whereas to the south of the river the topography is relatively flat,



including the flood plain of the river and suburbs on low-lying land toward Concord and Rhodes.

Medium and high density residential and mixed developments are under construction or approved for future construction in a number of areas analogous in location and visual exposure to the subject site, such as Shepherds Bay, Rhodes and Wentworth Point.

To the west of the site, the Shepherds Bay precinct, being transformed to urban residential medium to high density, dominates the visual context through to the established medium and high density residential areas of Meadowbank. To the east the visual context is predominantly of low density residential development.

Views from the north-east are limited by topography in the Top Ryde/ Victoria Road vicinity and views from the north east and north west are also limited by secondary ridges which run approximately south west from this main ridge, toward the Parramatta River.

Views from the flatter landscape to the south are less influenced by intervening topography, but more influenced by view blocking by buildings (eg. from the Rhodes locality), or by distance (eg. viewing distances from Concord and suburbs to its east on the south side of the Parramatta River are substantial, decreasing the visual effects of the building).

Although an increase in the height of the proposed building will increase the size of the visual catchment (ie. it will be visible from more locations), for reasons explained in the analysis of specific views below, the height in itself will not cause any increase in views lost to the public domain.

Consistent controls that have been applied to height and form of buildings in Meadowbank, a significant part of the currently approved development now being completed. This has created a consistent built form that stretches almost from Ryde Bridge to the Whitton Railway Bridge along the north side of the Parramatta River. Without a focus or a signature building to anchor this distinctive area to the river, the adjacent Ryde Bridge or the entry to Shepherds Bay from Concord, the area lacks a memorable or notable building to define and signify the landmark sit it occupies.

MOD 2 took all the good things at streetscape, pedestrian amenity and public domain from the former s.75W application, along with the potential of the competition winning design for innovation, interest and articulation, but missed the opportunity to foster a memorable, signature building, of design excellence. The approved envelope in MOD 2, in our opinion, simply continues the overall undistinguished height of the adjacent setting. It is such a missed opportunity, when the extra height proposed has no significant impacts on public domain or residential views.

## **4.1 Visual exposure**

A building on the subject site is exposed to a visual catchment that is more extensive to the south-west than to the north-east as noted in our report on the earlier s.75W application. The visual catchment also extends along the Parramatta River corridor, but more toward the south-east than the west. The visual catchment extends as far as Putney and Breakfast Point to the south-east and Wentworth Point to the west, as shown on the Map of Key Locations at Page 2 of the Views Analysis.



In the local context, views toward the site from the north and north-east are predominantly at a downward angle and the relatively flat background topography has the effect that even modest height structures such as the lower, 6-storey buildings at Rhodes form the background horizon of views from Church Street/Devlin Street on the Victoria Road ridge.

The remaining visual catchment to the north and north-east is limited by ridges that run south from the Victoria Road ridge, or by intermediate ridges closer to the Parramatta River, such as the ridge traversed by Morrison Road between Payten Street and Regent Street. The local topography has the effect of limiting views to a small area east and north-west of the subject site.

For example, to the east a ridge along which Regent Street runs south-west from Morrison Road blocks views from the public domain further east, other than from a local high point at the intersection of Morrison Road and Princes Street (Key location 13 in the Views Analysis).

North-west of the site development under construction in Belmore Street and Constitution Road blocks or will block views from the public domain of any building on the subject site.

The site is visible at relatively close range from a section of the Parramatta River foreshore south and south west between the Whitton Bridge, Blaxland Road at the former punt site, King George Park adjacent to the south-western revetments of Ryde Bridge and from the bridge itself (Key view places 4, 5 and 6 in the Views Analysis).

The site is visible more widely to the south and south east because of the extensive foreground of views across the Parramatta River and Brays Bay from the margins of Concord West. The foreshores contain reserves, lookouts, walkways, public wharves and other features facilitating public access and provide potential views from sensitive locations including heritage sites.

## **4.2 Identifying potential view locations**

We undertook an independent assessment of the likely visual exposure of the proposed envelope to test the scope and representativeness of the set of locations already photographed and modelled for the earlier s.75W application. As further buildings have been constructed in the visual catchment of the site since that time, we re-photographed the views using similar camera technology and provided the images to Cox, who prepared the updated Views Analysis.

As no change has occurred in the adjacent residential context (ie. Residences from which views could be affected) since the former s.75W application report was prepared, it was decided that the existing photographs indicating the likely view from residences adjacent to the subject site taken by drone technology could be used. Although the views were not updated and in some cases, would contain distant, new buildings (for example in Wentworth Point), in views toward the south-west, the analysis in terms of view loss would still be valid. Therefore the cost and difficulty of repeating the original drone photography for each view was not considered to be justified.

The criteria we adopted in advising on the locations and levels for views to be photographed from the drone in the first instance were as follows:

- The view locations to be photographed by drone are confined to the public domain.



- Residences were chosen only where they have balconies or windows to rooms which are at or as close as possible to the street alignment, so the photographs, while they are from the public domain, are as close as possible to an identified and practical viewing location.
- Photographs were taken only from levels where there is a potential for view loss in excess of or different from that which would be caused by a building occupying the existing approved envelope.

### **4.3 Limitations of drone photographs**

There are limitations in using photographs taken from a drone to simulate view loss, as follows:

- The drone is unable to provide a photograph from an internal or a private area.
- The location of the camera is closer to the items viewed than would occur in a private viewing location. As a result, the item causing view loss appears larger than would be the case in a view from a private residence.
- The drone camera is in unlimited space, whereas in a real viewing situation the view would be likely to be constrained at the sides and in the foreground by structures such as windows, reveals, doorway openings, walls, balcony floors, balustrades and other similar features. The horizontal and vertical extent of view to the human eye would therefore be less than the drone image.
- The camera height is accurately known but the eye height relative to viewing locations in individual buildings is approximate, as floor levels would need to be established with survey accuracy.

Notwithstanding the above limitations, drone images are very useful aids to demonstrating principles for view sharing and also because they can overcome many practical constraints on gaining access to private viewing places.

### **4.4 Modelling of effects of design scenarios on views**

Cox and Kennedy Associates Architects on our advice prepared a series of block model photomontages (appended in the Views Analysis) of three scenarios as seen from the viewing locations recommended by RLA and shown on the key map to the Views Analysis. These are tabulated below and include our analysis of the relative merits of each of the four development scenarios in relation to potential visual effects on views.

The graphics are organised to make it possible to compare the effects on views of four scenarios, as follows:

- a. The MOD1 approved envelope: The envelope is shown as a block model.
- b. The MOD2 approved envelope: The envelope is shown as a block model.
- c. The s.75W proposed envelope and DA massing: The envelope is shown with a white dashed line and the massing as an indicative 3D model.



## **5 Analysis of Visual Effects**

Our analysis of the visual effects of the envelope in the Concept Approval compared to the MOD2 and s.75W envelope scenarios follows.

So as to avoid repetition, we have grouped our analysis of the views in the Views Analysis, on the basis of the composition of the views, into six (6) groups, as similar principles apply to the visual impacts of the views in each group. In general, the main features that vary within each group are viewing distance. The groups to be analysed, referenced to the Key view locations on the Key Map in the Views Analysis, are as follows:

Group 1: Streetscape views in Church Street north of the site

Key Location 1, Church Street above Morrison Road

Key Location 2, Church Street below Morrison Road

Group 2: Medium range views from the west or south

Key Location 4, Ryde Bridge

Key Location 5, King George Park

Key Location 6, Blaxland Road

Key Location 7, Bowden Street

Group 3: Distant range views from the south-east

Key Location 8, Bennelong Park

Key Location 9, Public Wharf, Kissing Point Park'

Key Location 11, Wangal Reserve

Group 4: Distant range views from the west or south

Key Location 10, Kokoda Memorial

Key Location 19, Dame Eadith Walker Convalescent Hospital

Group 5: Public Domain south and east of the site

Key Location 3, Ryde Wharf

Key Location 12, Settlers Park, Waterview Street

Key Location 13, Morrison Road and Princes Street

Group 6: Private Domain, Holdmark and Meriton properties

Key Locations 14-18



## **Group 1**

### **Streetscapes in Church Street north of site**

Viewing distance 800m

In this medium range view south-west, the MOD 1 envelope closes the view opportunity to the south west toward Rhodes, whereas the re-distribution of massing in the MOD 2 envelope and therefore in the s.75W envelope maintains a wider spatial separation between built forms in the mid-ground and back-ground. The taller tower form in the s.75W than the MOD 2 envelope contributes a slim component to the composition of views. It blocks a lesser horizontal extent of view than the approved envelopes and the extra height sought compared to the MOD 2 envelope has no significant impact on access to views as the extra height proposed for the tower blocks only a view of sky space. No scenic features of the view are blocked by the part of the envelope that is taller than the MOD 2 envelope. The s.75W DA envelope creates less low height view blocking effects and is a better view outcome relative to MOD 1 approved envelope which blocks a wider horizontal proportion of the background district view.

The s.75W envelope appears as slim and defined as other tower forms in the same view, in Rhodes and Wentworth Point. The building would not appear out of place in this view composition.

## **Group 2**

Medium distance views from the west or south

Key Locations 4, Ryde Bridge, 5, King George Park, 6, Blaxland Road and 7, Bowden Street

The MOD 1 and MOD 2 envelopes appear similar in height. The massing of the built form in the MOD 2 and s.75W DA envelopes step down toward the adjacent Shepherds Bay development, forming an appropriate height transition, rather than the reversed massing of the approved envelope in MOD 1. However, both approved tower envelopes appear squat and blocky. Each of the three scenarios for a tower envelope is above the horizon of the view behind. The absolute height of the s.75W envelope is therefore not responsible for any additional view loss.

The slim and blade-like tower of the s.75W envelope contributes a new component into the composition of the view that complements the lift span of Ryde Bridge, while the lower podium in the DA massing decreases the bulk of the horizontal component and clearly sits behind the tower, giving expression to the clarity of its expression and the slimness of the tower. Each of the three scenarios for an envelope blocks some items of view behind, as would be expected, given the consistently low height controls imposed on Shepherds Bay.

## **Group 3**

Distant range views from the south-east, Key Locations 8, Bennelong Park, 9, Public Wharf, Kissing Point Park and 11, Wangal Reserve





Medium-to distant range views with similar composition, the view from Kissing Point Park, view 9 illustrates the comparison best. The MOD 1 concept approved envelope appears squat and insensitive to the high density residential context adjacent to its west, while the MOD2 envelope appears equally squat and similar in profile. The narrower form of the tower element in s.75W DA massing is evident. The extra height sought gives definition to the tower, which benefits from the absence of a podium on the eastern side, toward the viewer. As the tower appears to stand alone in this view, the greater height than in the approved envelope in MOD 1 and MOD 2 is evident, despite being only five storeys. It is also evident that the height does not hide, block or compete with views or other items. For example the wide spatial separation between the building and the lift span structures of the Ryde Bridge remain unchanged. The increased height of the tower that is sought does not diminish or change the contribution of the bridge to the view.

## **Group 4**

Group 4: Distant range views from the west or south

Key Locations 10, Kokoda Memorial and 19, Dame Eadith Walker Convalescent Hospital

These are both distant views toward the north-west from culturally important sites in the public domain. The MOD 1 and MOD 2 envelopes appear similar at the distances involved and the location of the tower toward the east in MOD 2 is not evident. The slimmer form of the s.75W envelope, by comparison to either of the approved envelopes, is obvious, in the oblique views. The taller tower form in the s.75W DA massing contributes only a slightly taller element to the composition of views, but no views to scenic or heritage items are negatively affected. The increased height of the tower that is sought does not diminish or change the contribution of the Ryde Bridge or other scenic items in the view. The s.75W building would be a positive contribution to the views and a signifier of entry to Shepherds Bay on the northern edge of the River.

## **Group 5**

Group 5: Public Domain south and east of the site

Key Locations 3, Ryde Wharf, 12, Settlers Park, Waterview Street and 13, Morrison Road and Princes Street

In the medium-range view east from Ryde Wharf, the forms of the MOD 1 and MOD 2 envelopes appear similar in height in the tower component, but the MOD 1 distribution of bulk turns it back to the residential setting of Shepherds Bay, whereas the MOD 2 and s.75W application open to the public domain. Both approved towers however, appear squat and wide and inappropriately low in comparison to the podium. The slim and blade-like tower in the s.75W envelope and DA massing contributes a new slim component that sits appropriately in the composition with the podium. None of the envelopes leads to view blocking effects to scenic features. Although five storeys higher than the MOD 2 envelope, the s.75W DA



massing envelope for the tower appears only slightly taller than the MOD 2 approved envelope and to be slimmer and better articulated.

Views from the residential context east of the site are represented by Views 12 and 16. The view would be similar in the lower part of Osborne Avenue and Regent Street south west of Wade Street, which largely defines the small close-range visual catchment. The view from Morrison Road and Princes Street is from an isolated local high point. The MOD 1 and MOD 2 envelopes are of overall low visibility. The taller tower form in the s.75W envelope and DA massing contributes a new component to the composition of views, that appears compatible with the many background buildings in Rhodes and Wentworth Point in the visual context. The extra height sought in the s.75W DA massing does not cause any additional view loss or significant impact on the view composition compared to the approved envelopes.

## **Group 6**

Group 6: Private Domain, Holdmark and Meriton properties in Porter and Well Streets, Key Locations 14-18

Key locations 14 and 15 are Holdmark Site 2 equivalent to Levels 2 and 4, north of the site in Porter Street. The approved envelope in MOD 1 continues the apparent street wall in Porter Street, with the south western tower appearing to rise directly off the street alignment. The MOD 2 and s.75W massing envelopes as a result of displacement of the tower to the east, opens the view south and provides a more spacious and scenic axial view. As is the case on every view analysed above, the extra height sought in the s.75W DA massing does not lead to view loss or compete with scenic or heritage items in the view. The DA massing with reduced podium provides a better transition down toward the proposed plaza on the north-west side of the subject site, in the axial view down the street.

In the axial close view south-east from Well Street (Key location 15), the approved envelope in MOD 1 has no significant articulation to either Well or Porter Street. The MOD2 and s.75W envelopes provide a more satisfactory transition to both streets. The s.75W envelope and DA massing provides a more compatible transition to lower buildings in Well Street.

Key location 17 is the Meriton buildings north of the site in Porter Street, that provide a close-range view south-west from the equivalent to level 3 and 5, from Building A, that fronts Well and Porter Streets. The building is angled relative to Well Street to retain a potential vista to the south-east and the Parramatta River, between the footprint of the proposed building and Building D, which faces Church Street. This elevation of the building also has views directly down Porter Street toward the River and Rhodes shore beyond. The MOD 1 envelope with minimal podium articulation rises essentially off the street alignment of Porter Street, confining views to the axis of the street, with Rhodes in the background. The MOD 2 and s.75W envelope, with the tower displaced to the south east and ground level plaza, result in opening of the view south-east, which includes the lift span structures of the Ryde Bridge heritage item and vegetation in the foreshore reserves. The rendered perspective on the cover page of the Visual Analysis graphics package appended to this report gives an idea of the likely openness and character of a potential canopy/marquee structure in this location. The s.75W DA massing and MOD 2 approved envelope are similar with regard to view sharing.



It should be noted that all levels of Meriton Building A benefit from improved view outcomes as a result of the s.75W DA massing, although the benefits are greater for levels 3-5. All levels benefit from the more spacious composition of the foreground of the view and the activated street and public domain provided by the proposed plaza to Porter Street.

In the view representing the MOD 1 envelope from Key location 14, from the only level in Building D that is likely to have a view over the podium of the approved envelope in MOD 1, there is a cameo view that includes part of Ryde Bridge, between the two tower elements. That cameo view would be lost in MOD 2 and the s.75W DA massing scheme.

The final view in this group is the view south from Holdmark Site 2, Porter Street. The s.75W DA massing provides a more spacious sense to the view than either of the approved envelopes in MOD 1 or MOD 2.

## **6.0 Summary**

### **6.1 Public Domain Views**

A comprehensive and representative sample of all of the kinds of views in the public domain that could be affected by construction of a building in the envelopes approved in MOD 1 and MOD 2 or as proposed in the s.75W DA massing have been analysed. While the visual catchment of a taller tower form is larger than for the approved envelope, view availability in the local visual catchment will be the same or greater with a taller and slimmer building form as proposed in the s.75W DA massing, as shown in the analysis above.

The additional height of the building sought in the s.75W application will not cause any significant additional or different loss of view, other than of a view of a slightly larger and differently shaped area of sky. Neither the tower form of the building nor its ultimate height if the increased height sought is approved, will cause increased view loss, compete with or diminish the significance of scenic or heritage items.

### **6.2 Private Domain Views**

Locations with potential to be affected by view loss in the private domain have been identified as confined to close range views from buildings recently constructed to the north-east and north-west of the subject site by Holdmark in Porter Street and Meriton in Porter and Church Streets.

The analysis of photomontages simulating views from a representative sample shows that the approved envelope in MOD 1 restricts views to an axial view down Porter Street for most residences affected, whereas the MOD 2 and s.75W DA massing preserve a significantly wider view, including scenic and heritage items of vegetation, the Ryde Bridge and prospect of a view beyond. Those views also include less built form and bulk in the foreground and views of the activated streetscape and plaza proposed, along with the increased amenity and scenic quality benefits of that view.

MOD 2 as approved blocks one view that will also be lost in the s75W DA massing, for an isolated part of Meriton Building D (135 Church Street) at Level 5. In compensation for this loss, all levels of Building A (31 Porter Street) would benefit from the 75W DA massing. On



balance the view loss is considered to be minor compared the view regained for more viewers by the s.75W DA massing.

With regard to the overall merits of the s.75W application, in our opinion, the site deserves a signature building. The envelopes approved in MOD 1 and MOD 2 do not deliver a building that is of design excellence in that regard. MOD 2 provides spatial, scenic and public domain benefits at street level, but does not deliver potential for a distinctive, memorable, signature building.

The s.75W building proposed has the potential to be the landmark building that the site deserves, while in absolute height it is modest, in the local context. We consider that the s.75W application can be supported on visual impacts and view loss grounds.

Dr Richard Lamb

A handwritten signature in black ink that reads 'Richard Lamb'.