

# Addendum Visual Impact Assessment

Parramatta Over Station Development and Adjacent Station  
Development

Submitted to NSW Department of Planning, Housing and  
Infrastructure on behalf of Sydney Metro



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## Attachments

Attachment	Author
A. Visual Impact Evidence	Virtual Ideas and CMS Surveyors

# 1.0 Introduction

## 1.1 Purpose

The purpose of this supplementary visual impact assessment (the supplementary VIA) is to address the following visual impact assessment (VIA) matters raised in State government agency advice and requested by Department of Planning, Housing and Infrastructure (DPHI) as part of their 'request for further information'.

Table 1 Agency advice and request for further information – visual impact assessment matters

Item ref.	Request	Agency	Response
1.	Regarding impacts to significant view corridors, Historic Heritage Impact Assessment and the Visual Impact Assessment. Please consider the impacts to various views to and from the site. While the proposed buildings will contribute further to the already altered views to the CBD from significant places such as Old Government House, the change to those views is assessed as “not adversely impacted	Heritage NSW	A response to this item is provided in sections 2 – 5 below.
2.	Revise the Visual Impact Assessment for the viewpoint at the south-east corner of Macquarie Street and Smith Street (Viewpoint 3) to consider the educational use and any heritage item and open space at this location	DPHI	A response to these items is provided in section 6 below.
3.	The Application is supported by a Visual Impact Assessment (VIA) which includes an assessment of a viewpoint at the south-east corner of Macquarie Street and Smith Street (Viewpoint 3). This viewpoint is taken from the corner of the Arthur Phillip High School grounds where a local heritage item and areas of open space are located. The assessment of this viewpoint does not identify that there is an educational receiver at this location. SINSW requests that DPE’s assessment of visual impacts considers that there is an educational receiver at Viewpoint 3	School Infrastructure NSW	

## 2.0 Background

Sydney Metro lodged concept SSDA (SSD-35538829) with DPHI in November 2022. This SSDA was supported by a VIA (Appendix\_GG) (the existing VIA) that assessed the proposal’s likely visual impact on the public domain including ‘historic views to be protected’ identified in the Parramatta Development Control Plan 2011.

The conclusion of this VIA was:

- ‘This VIA has demonstrated that the Concept SSDA can enable an outcome for the site that will not give rise to any significant or unacceptable visual impact on the public domain that cannot be appropriately mitigated through the planning framework or conditions of development consent. On this basis, the conclusion of this VIA is that the proposal can be supported on the grounds of visual impact on the public domain appropriate to this stage of the planning process’.



The SSDA was publicly exhibited during November and December 2022. On 6 February 2023 DPHI issued a request to prepare a response to agency advice received during public exhibition. **Table 3** identified matters relevant to VIA.

The key matter raised is item 2 by Heritage NSW requesting consideration of the proposal’s likely impact on key public domain views from Old Government House (OGHD).

The main planning document addressing these views is ‘Development in Parramatta City and the Impact on Old Government House and Domain’s World and National Heritage Listed Values Technical Report’ (the Technical Report) prepared by Planisphere and published in 2012.

It identifies the following key public domain views from OGHD:

- View 1: OGHD towards the city
- View 5: Bath house area to city
- View 8: Parramatta river views (partial)
- View 12: George Street.

We note that the existing VIA has already assessed impact on View 12: George Street.

The following figure shows the location and extent of these views.

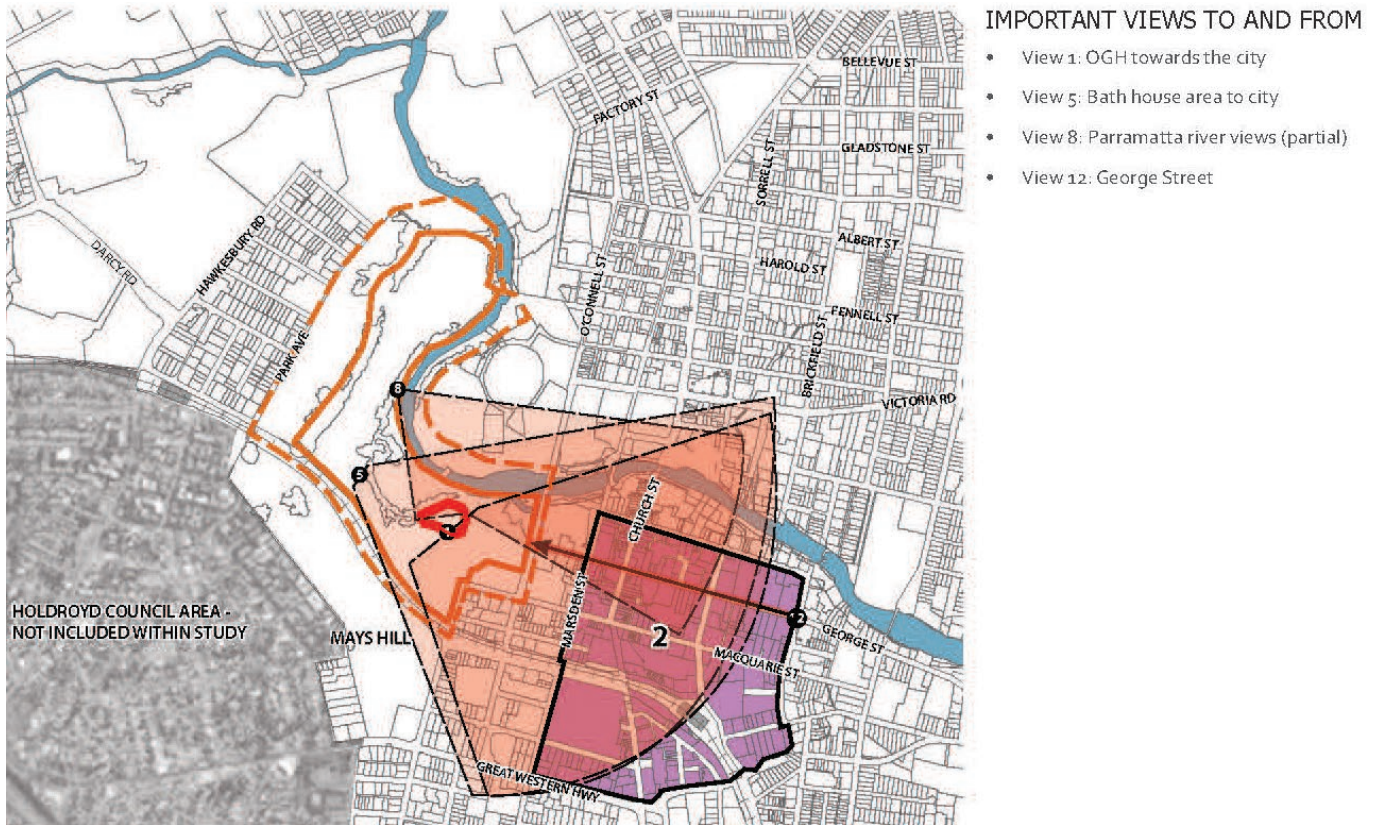


Figure 1 Location and extent of important views from the OGHD

Source: Planisphere

The following figures shows these views as they appear in the Technical Report.



VIEW 1 LOOKING EAST DIRECTLY DOWN GEORGE STREET ALIGNMENT



LOOKING SOUTH EAST FROM THE FRONT OF OGH

LOOKING SOUTH EAST TOWARDS THE GATEHOUSE

Figure 2 View 1: OGH towards the city as contained in the Technical Report  
Source: Planisphere



VIEW 5 LOOKING EAST



VIEW 5 LOOKING SOUTH EAST

Figure 3 View 5: Bath house area to city as contained in the Technical Report  
Source: Planisphere





VIEW A

Commonwealth Building

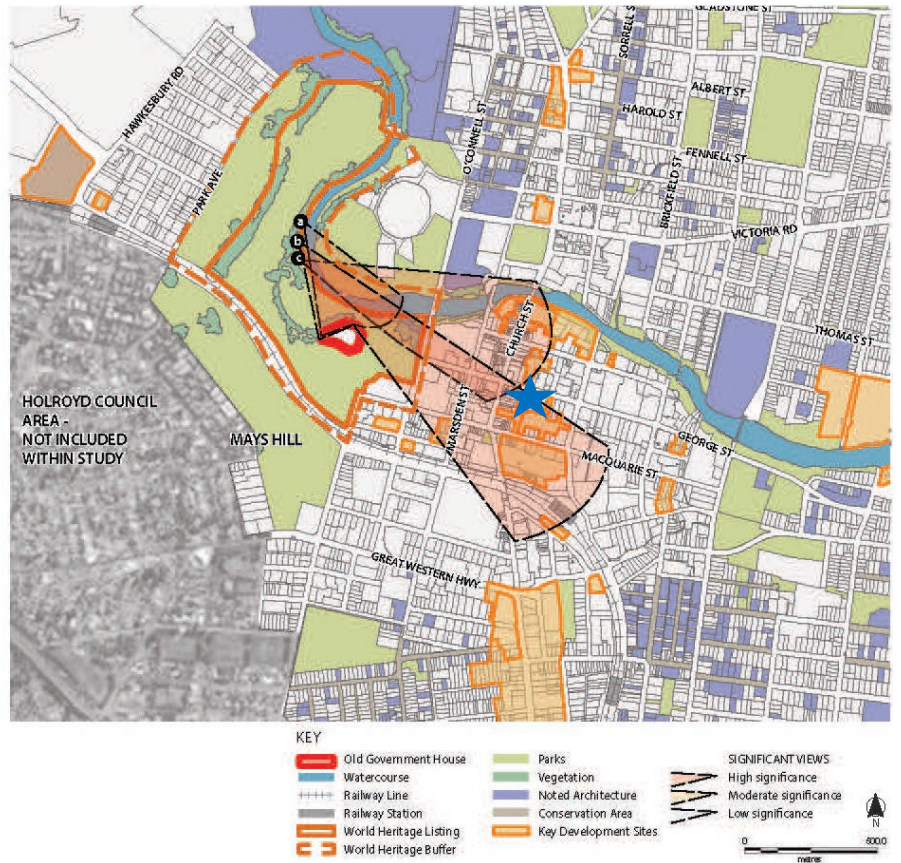


VIEW B

Park Royal Noller Bridge NSW Registry building



VIEW C



LOCATION OF VIEWS

Figure 4 View 8: Parramatta River views (partial) as contained in the Technical Report

Source: Planisphere

**Note:** for ease of interpretation, this map has been amended by Ethos Urban to show the general location of the site by a blue star

The Technical Report also establishes a vision and supporting design guidelines for the City Centre area in which the site is included.

## 3.0 Method

The method used in this VIA involved 3 main steps:

1. Visual analysis
2. Preparation of the evidence base
3. Visual impact assessment.

### 3.1 Visual analysis

Considerable time that has elapsed since publication of the Technical Report and extensive renewal of the Parramatta CBD has occurred over this time. As such, this stage involved desktop review of aerial photography (Nearmap and Google Maps) and a site visit to identify the viewpoints that were most representative of the 3 viewpoints having regard to the description of their views & settings and supporting photographs contained in the Technical Report. While not an exact match, viewpoints that align with this description and photographs have been able to be selected. These viewpoints are shown in the **below figure**.



### 3.2 Preparation of the evidence base

CMS Surveyors and Virtual Ideas were engaged to prepare surveyed aligned photomontages for each viewpoint. This involves undertaking survey, photography and computer based modelling work in accordance with the Land and Environment Court of NSW 'Photomontage Policy'. Attachment A provides further information on this aspect of the method.

### 3.3 Visual impact assessment

VIA is a highly complex area that involves professional value judgements. While there is a wealth of guidance documents, there is currently no universally agreed, national level guideline for VIA in Australia (AILA, 2019). As noted by the Land and Environment Court of New South Wales (the LEC) in *Rose Bay Marina Pty Limited v Woollahra Municipal Council and anor* [2013] NSWLEC 1046 (Rose Bay), the key to addressing this challenge is to adopt a rigorous methodology.

As the scope of this VIA is targeted on three views only and the existing VIA has already undertaken broad visual analysis, assessment was undertaken against the vision and supporting design guidelines for the City Centre area in which the site is included informed by consideration of the factors of sensitivity, magnitude and significance that is the hallmark of the international standard 'Guidelines for Landscape and Visual Impact Assessment' version 3 (GLVIA3) (Landscape Institute and I.E.M.A, 2013) and other widely referenced guidance such as the 'Guideline for landscape character and visual impact assessment' (TfNSW, 2023), 'Visual Landscape Planning in Western Australia: a manual for evaluation, assessment, siting and design' (Western Australia Planning Commission, 2007), 'Topic Paper 6 – Techniques and criteria for judging capacity and sensitivity' (the Countryside Agency and Scottish Natural Heritage, 2014) and Rose Bay.

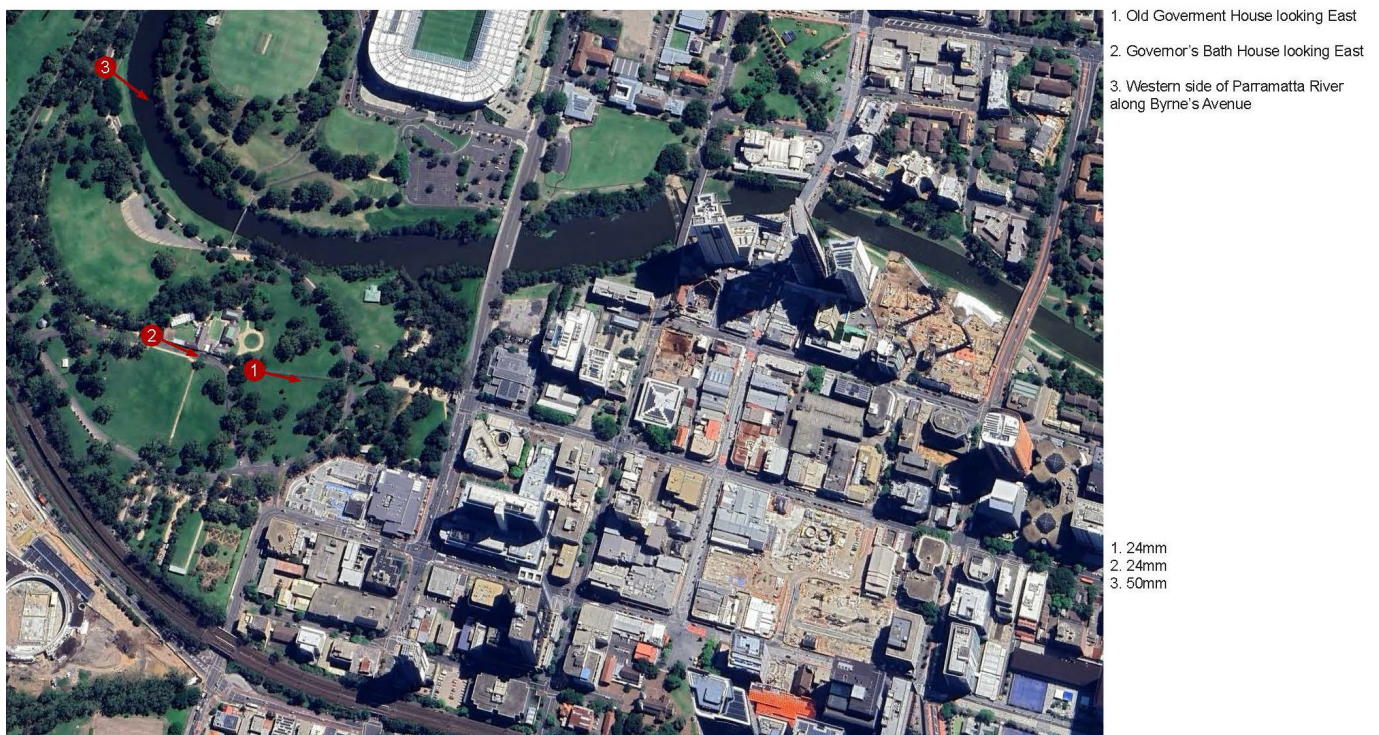


Figure 5 Location of viewpoints

Source: Virtual Ideas

## 4.0 Visual impact

This part of the VIA provides a photograph showing the existing view and a photomontage showing the likely future view for the three assessed views, being:

1. View 1: OGH D towards the city
2. View 5: Bath house area to city
3. View 8: Parramatta river views (partial)
4. View 12: George Street.

### 4.1 View 1: OGH D towards the city

The following figure shows the existing view from this location.

#### 4.1.1 Existing view



Figure 6 View 1: OGH D towards the city – existing view

Source: Virtual Ideas



#### 4.1.2 Likely future view

The following figure shows the likely future view from this location.



Figure 7 View 1: OGH towards the city – likely future view

Source: Virtual Ideas

#### 4.1.3 Discussion

The proposal is visible in the background of the view partly screened by trees.

The statement of values significance is as follows:

- ‘Multi-layered elements visible including the layout of pathways. Relationship with the alignment of George Street, Macquarie Street and Hunter Street. Sense of landscape setting in the foreground of views and through the juxtaposition of city and parkland’.

The Technical Report notes the moderate visual quality of the city of Parramatta against a parkland setting, and notes the prominence of the Commonwealth Building and the screening of most other city buildings by trees.

Since this time the Parramatta CBD has grown considerably, with many buildings now appearing equal to or greater in scale than the Commonwealth Building.

While noting the distinct, visually interesting, sloped profile of the buildings, the proposal integrates with this new skyline profile. It is also considered to be compatible with the main visual characteristics of the view, retaining the relationship between the lawns in the foreground, the trees in the mid-ground and the Parramatta CBD in the background.



## 4.2 View 5: Bath house area to city

The following figure shows the existing view from this location.

### 4.2.1 Existing view



Figure 8 View 5: Bath house area to city – existing view

Source: Virtual Ideas

#### 4.2.2 Likely future view

The following figure shows the likely future view from this location.



Figure 9 View 5: Bath house area to city – likely future view

Source: Virtual Ideas

#### 4.2.3 Discussion

The proposal is visible in the background of the view partly screened by trees.

The statement of values significance is as follows:

- ‘Strong layering of landscape elements including the bath house, the Redoubt and Observatory. Strong sense of the relationship between OGH and Parramatta and the general landscape setting’.

The Technical Report notes that ‘views of city buildings are partly screened by mature eucalypts and other tree species’, ‘views terminate at city development’ and ‘the park edge to south ‘bleeds’ into the city, there is a lack of enclosure and definition between park and beyond.

The proposal does not adversely impact the values significance of the view. It can be considered to strengthen the Parramatta CBD skyline, assisting in better defining the park’s edges.

As with view 1: OGH towards the city, the proposal integrates with the CBD skyline profile and is compatible with the main visual characteristics of the view, retaining the relationship between the lawns in the foreground, the trees in the mid-ground and the Parramatta CBD in the background.



## 4.3 View 8: Parramatta river views (partial)

### 4.3.1 Existing view

The following figure shows the existing view from this location.



Figure 10 View 8: Parramatta river views (partial) – existing view

Source: Virtual Ideas



### 4.3.2 Likely future view

The following figure shows the likely future view from this location.



Figure 11 View 8: Parramatta river views (partial) – likely future view

Source: Virtual Ideas

### 4.3.3 Discussion

The proposal is visible in the background of the view largely screened by trees.

The statement of values significance is as follows:

- 'Strong layering of landscape elements including the river, partial views towards Old Government Farm, exotic plantings and OGHF which sits within a dominant location. Evocative of the Macquarie period although tree cover is now greater'.

The Technical Report notes that a 'large city building (Commonwealth Building on O'Connell St) prominent above horizon, this building dwarfs OGHF', 'overall, moderate aesthetic characteristics adversely affected by large city building', 'overall this view reads as a landscaped parkland on edge of the city with moderate aesthetic characteristics'.

As with the views, since the time of the Technical Report's publication the CBD skyline has grown considerably. Whereas the Commonwealth building previously stood alone and largely anomalous with the landscape of the view, it is adjoined by buildings of similar height and scale to its immediate south, and the separate, taller Parramatta Square and 29 Hunter Street towers. As a consequence, the CBD has now become an integral part of the character of the view. It can be argued that this change enhances the perceptual aspect of dynamism of the view, with a skyline consistent with the major role that the CBD plays in Greater Sydney juxtaposed against a more genteel, low key landscape dating from the colonial era.

The proposal integrates with the CBD skyline profile and is compatible with the new, main visual characteristics of the view.

## 5.0 Assessment of visual impact

The following section assesses the proposal against the Technical Report design principles.

### 5.1 Design principles

#### Principle

##### **Principle 1: Visual prominence and symbolism**

The backdrop of the buildings in the City of Parramatta should provide a setting for Old Government House compatible with the commanding spirit of the place.

New development should not detract from the setting of Old Government House as the former seat of colonial power, and its traditional 'master and commander' relationship with Parramatta. New development should reinforce the relationship between Old Government House and the original Georgian town plan, particularly the axis of George Street.

#### Assessment

As can be seen from the photomontages and has been noted, the 'backdrop of the buildings in the City of Parramatta' has changed considerably since the publication of the Technical Report. However, their larger scale and more contemporary form represent a distinct visual contrast to the OGHD and its gardens. While of larger scale, largely due to distance and the proportion of the view occupied by landscaped open space, it is not considered that the buildings individually or as a landscape composition overwhelm or diminish the OGHD or its gardens. As it integrates with this new skyline profile, the same opinion applies to the proposal.

As it adjoins and is parallel to the alignment of George Street, the proposal provides a visual reference point to this important city street. It is reasonable to assume that as further development occurs along George Street that its axis will become more well defined, in particular from views flush with its alignment.

#### Principle

##### **Principle 1: Landscape setting**

New development should not dominate the landscape setting of Old Government House and Domain or detract from the mostly 'green' outlook north, allowing the Domain to retain its existing landscape character.

New development should not dominate the landscape setting of Old Government House and Domain, including the inter relationship between landscape elements.

#### Assessment

Being located in the background of views to the east and forming part of a coherent landscape element in the form of the Parramatta CBD, the proposal does not dominate the landscape setting of OGHD.

Principle

**Principle 1: Layering of cultural heritage elements**

New development should retain and enhance views to, from and between the cultural heritage elements that highlight the layered history of the place.

New development should retain views that demonstrate the multi-layers of built and landscape elements, which contribute to the story of the place. These elements evoke a sense of the past, and highlight the city’s importance in the course of Australia’s cultural history. These ‘layers’ or elements include the Georgian Town Plan, Old Government House itself, the Domain, the crescent, Old Government Farm, the dairy, the river, the formal layout of the carriageways, other historic buildings and monuments, the broad lawns, and the picturesque ‘English style’ garden setting.

Assessment

The proposal retains existing views and their character. While not impacting historic elements, the proposal contributes to layering of past and future Parramatta in view consistent with the important economic and social / cultural role the CBD plays in Greater Sydney.

**5.2 Design guidelines**

The following table assesses the proposal against the Technical Report vision and desirable future development guidelines.

5.2.1 Vision

Intensive development will be contained within this precinct, with distinctive ‘edges’ at the railway line and Phillip Street to improve the legibility of the city centre when viewed from the OGHD, and to ensure that built form, when viewed from the Domain, does not visually dominate the skyline over a broad area.

The proposal represents intensive development located within the bounds of this area, and in particular north of the railway line and south of Phillip Street. As such, it contributes to the legibility of the CBD core and is consistent with expectations for the location of growth to the east of the OGHD.

5.2.2 Desirable future development guidelines

Table 2 Assessment against the Technical Report design guidelines

Ref	Provision	Assessment	Consistency
A5	The most intensive development should be contained within the city central precinct to ensure that the city buildings do not visually dominate the skyline over a broad area. This can be achieved by:	Refer below	Yes
A5.1	<ul style="list-style-type: none"> <li>ensuring that the tallest buildings within Parramatta are located within the City Central precinct</li> </ul>	The proposal is located in precinct 2: City Central as identified under the Technical Guidelines	Yes
A5.2	<ul style="list-style-type: none"> <li>ensuring that there is a distinctive height edge to the city centre, particularly at Phillip Street</li> </ul>	The proposal is located distant from Phillip Street	Yes



Ref	Provision	Assessment	Consistency
B6	New development should strengthen the visual connection between the OGH and the city, when viewed from the Domain, including by improving the legibility of the central city and its buildings (refer to Important Views 1 and 5). This may be achieved by:	Refer below	Yes
B6.1	<ul style="list-style-type: none"> <li>ensuring that towers are well proportioned, with a visually interesting top, and an elevation that enhances the skyline; and</li> </ul>	The proposal is well proportioned representing a coherent collection of slender towers with sloped, visually interesting elevations	Yes
B6.2	<ul style="list-style-type: none"> <li>introducing upper level setbacks to allow for view sharing from, and between, buildings; and</li> </ul>	This is not relevant for impact on the OGH	Yes
B6.3	<ul style="list-style-type: none"> <li>ensuring buildings are designed to the highest contemporary architectural standards</li> </ul>	The proposal has been through a lengthy design review process, and as such has the capability to achieve the highest contemporary architectural standards	Yes
B7	New development in George Street should strengthen and frame the vista along the street and further reinforce the formal Georgian town plan. This concept is outlined within the City Centre DCP and includes:	Refer below	Yes
B7.1	<ul style="list-style-type: none"> <li>consistent setbacks (including consistent front setbacks at street level); and</li> </ul>	The proposal strengthens and frames George Street	Yes
B7.2	<ul style="list-style-type: none"> <li>no building facade clutter (including signage), particularly below first floor level is also desirable.</li> </ul>	While not visible, this may be conditioned through development consent	Yes
B8	New development throughout the city centre area should reinforce the formal layout of the Georgian town plan with:	Refer below	Yes
B8.1	<ul style="list-style-type: none"> <li>consistent setbacks (including continuous front setbacks at street level); and</li> </ul>	The proposal strengthens and frames George Street	Yes
B8.2	<ul style="list-style-type: none"> <li>orientation of buildings towards the street grid.</li> </ul>	The proposal is aligned with and reinforces the street grid	Yes

## 6.0 Viewpoint 3

As required under item 2(c) of the Request for Information (RFI) that was issued by DPHI on 6 February 2023, this VIA is required to consider the education uses and historic values that are associated with Viewpoint 03, reproduced at **Figure 12** below. The below provides a revised visual impact assessment of Viewpoint 3 with consideration of the education uses and historic values associated with this location.



**Figure 12 Viewpoint 03: Existing (left) and with proposed building envelope (right)**

Source: Virtual Ideas

The following is noted in response to item 2(c) of this RFI:

- Part of the Western Sydney University (WSU) ‘Parramatta City Campus Library Hub’ building (169 Macquarie Street) is observable in Viewpoint 03 at the south-west corner of the intersection. The contemporary design, bulk and height of this building is characteristically similar to surrounding commercial buildings. Notwithstanding the education uses that are accommodated within this building, it is in keeping with the commercial context that is presented by Viewpoint 03. Alike the EY Building, the WSU Parramatta City Campus Library Hub building is not considered to have a perceptible association with local character values.
- Arthur Phillip Highschool is sited at the south-east corner of the intersection. This education use is not visible within Viewpoint 03, which is angled in the opposing direction. Notwithstanding this, it is necessary for any potential visual impact that could be associated with the level of streetscape amenity afforded to Arthur Phillip Highschool to be considered with particular regard for associated historic values. Specifically, it is acknowledged that Arthur Phillip Highschool is identified as a local heritage item under Schedule 5 of the PLEP 2011.
- The EIS and supporting design documentation has established that the proposal does not compromise the desired street wall alignment along Macquarie Street, in addition to the alignment of the Civic Link. With further regard for the commercial context of the Parramatta CBD and the retained extent of the open sky vista at Viewpoint 03, the proposal is not considered to give rise to any unacceptable visual change that would be observable from the site of Arthur Phillip Highschool.
- While Kia Ora House (I716) is a visible background element, the maintenance of sight lines towards this heritage item from the position of Viewpoint 03 is not provided for by the permitted building envelopes for future development that will front the northern side of Macquarie Street. Irrespective of this, it is reiterated that unobstructed sightlines towards Kia Ora House were only enabled recently by the demolition of existing development to provide for the Parramatta OSD and ASD. The proposed nature of visual change that is observable at Viewpoint 03 is supportable with regard for the historic values associated with Kia Ora House, which will be protected and enhanced.
- Specifically, the following recommendations made by the Historical Heritage Impact Assessment are acknowledged in relation to Kia Ora House:

*“Engage a suitably qualified heritage architect in the development of future building design of new buildings and the adaptive reuse of the heritage structures”*

*“The Conservation Management Plans being prepared for Shops (I703) and Kia Ora (I716) are to be implemented in planning and development of future Detailed SSDA(s) on the subject sites”*

## 6.1 Sensitivity to Nature of Proposed Change

The following table provides an assessment of the sensitivity of this view to the nature of change proposed. As mentioned, the RFI that was issued by DPHI on 6 February 2023 has required historic values and education uses that are associated with Viewpoint 03 to be considered by this VIA.

Arthur Phillip Highschool, including the historic values associated with this education use, does not have high sensitivity to the nature of visual change proposed. This is because the proposal is in keeping with the commercial context that is presented by Viewpoint 03, whereby any visual change observed from the site of the Arthur Phillip Highschool would not be unanticipated. This same conclusion can be drawn in relation to the historic values associated with Arthur Phillip Highschool, which are not compromised by the nature of visual change proposed. In this regard, it is reiterated that the proposal has made reasonable provision for the achievement of an amenable streetscape design outcome at the Macquarie Street frontage.

Based on discussion provided above and within the former section, visual characteristics and historic values that are associated with Viewpoint 03 are considered to have a low level of sensitivity to the nature of visual change proposed. While the number of pedestrian and vehicle receptors will be substantial at this viewpoint, receptor sensitivity is not considered to be high with regard for the nature of visual change that is reasonable to anticipate within the Parramatta CBD. On balance, the overall level of sensitivity to the nature of visual change proposed is assessed as low-medium.

**Table 3 Viewpoint 03: sensitivity to the nature of change proposed**

Factor	Assessment	Level
Type of people	Workers	Refer below.
	Visitors / Recreation	Refer below.
Number of people	High	Refer below.
Social and cultural value of the view	As outlined above, social and cultural values (including historic values) that are associated with Viewpoint 03 have a low level of sensitivity to the nature of visual change proposed.  This determination is appropriate with regard for the commercial setting of the Parramatta CBD, high-rise character form, and the distance between the site and Arthur Phillip High School.	Low
Visual characteristics	Built form of scale is visually prominent. However, this is not unanticipated in the context of Parramatta CBD. Further, the EY Building is a conventional commercial office building that does not present a meaningful visual reference point at the intersection of Macquarie Street and Smith Street.	Low
Sensitivity		Low-Medium

## 6.2 Magnitude of Visual Impact

As mentioned, impacts are capable of being reversed and/or addressed through design development in all instances, due (in part) to the preliminary nature of the Concept SSDA for the over and adjacent station development.

The following table assesses the magnitude of the change proposed.



**Table 4 Viewpoint 03: Magnitude of Visual Impact**

		Duration and / or reversibility			
		Ongoing and irreversible	Ongoing capable of being reversed	Limited life (5 – 10 years)	Limited life (< 5 years)
<b>Scale of change and geographical extent of the area influenced</b>	Major change over wide area	Dominant	Considerable	Considerable	Noticeable
	Major change over restricted area or Moderate change over wide area	Considerable	Considerable	Noticeable	Noticeable
	Moderate change over restricted area or Minor change over a wide area	Considerable	<b>Noticeable</b> The area of perceptible change is the backdrop of the EY Building. Sight lines down Macquarie Street are not obstructed.	Noticeable	Perceptible
	Minor change over a restricted area or Insignificant change	Perceptible	Perceptible	Perceptible	Imperceptible
	Imperceptible change	Imperceptible	Imperceptible	Imperceptible	Imperceptible

### 6.3 Significance of Visual Impact

Based on the sensitivity of the view to the nature of change proposed and the magnitude of change proposed, as can be seen in the following table the proposal is considered to have a low significance of visual impact.

**Table 5 Viewpoint 03: Significance of Visual Impact**

		Magnitude				
		Dominant	Considerable	Noticeable	Perceptible	Imperceptible
<b>Sensitivity</b>	High	Major	High	Moderate	Low	Negligible
	Medium	High	Moderate	<b>Low</b>	Low	Negligible
	Low	Moderate	Low	Low	Negligible	Negligible
	Negligible	Low	Low	Negligible	Negligible	Negligible

## 7.0 Conclusion

As is supported by the evidence base of photos and photomontages, the proposal:

- is located within the area identified by the Technical Report as being suitable for intensive development
- integrates with the existing, prevailing Parramatta CBD character, scale and form
- in doing so, it strengthens the strong visual edge to the OGH formed by the CBD
- by juxtaposing the old and the new, this edge contributes to layering of past and future Parramatta in view consistent with the important economic and social / cultural role the CBD plays in Greater Sydney
- while of larger scale, largely due to distance and the proportion of the view occupied by landscaped open space, it is not considered that the CBD buildings individually or as a landscape composition overwhelm or diminish the OGH
- as it adjoins and is parallel to the alignment of George Street, the proposal provides a visual reference point to this important city street.

Overall, the proposal is considered to retain existing views and their character, and is consistent with the design principles applying to all development as well as the vision and design guidelines for the City Centre area under the Technical Report.

This VIA has also assessed the magnitude and significance of visual impact for Visual 3 with consideration of the education uses and historic values associated with this location. In doing so, it is demonstrated that, notwithstanding, the magnitude of the visual impact remains at being noticeable, and the significance of the visual impact remains low.

As such, it is the conclusion of this VIA is that the proposal can be supported on the grounds of visual impact on the public domain appropriate to this stage of the planning process.

# Attachment A

Visual Impact Evidence

