

22 April 2024

SAAS Aus Pty Ltd  
C/- Jackson Environment and Planning  
Suite 102, Level 1, 25-29 Berry St  
North Sydney NSW 2060

To Whom It May Concern,

**Re: Development Application No 24/0302 (Lot 51 DP 130176 and Lot 2 DP 1070888)**

Sue Rosen Associates have been commissioned to provide a **peer review** of the Visual Impact Assessment produced for the proposed subdivision and industrial development at 2 & 10 Bowman Road Moss Vale NSW 2577 ('study site').

The study site is not located on the site of a heritage item, or in a heritage conservation area, however it is in the vicinity of the following heritage items:

- *Browley House, grounds and outbuildings* (146 Oldbury Rd, Sutton Forest)
- *Bonheur House, grounds and outbuildings* (270 & 254 Oldbury Road, Sutton Forest)

The heritage map identifying the curtilage of these items included in the VIA at page 39. We note that Council has not required that a Heritage Impact Statement be provided as a part of the DA documentation package.

From our review of the DA documentation and correspondence, we understand that from a heritage/visual impact perspective, Council requires:

1. A 15m wide landscaped area be provided at the study site along lot frontages to internal access roads and along boundaries with rural zoned land outside the Enterprise Corridor; and
2. That the landscaped zone along the southern boundary of Lot 3 near Building 3 (along the Hutchinson Road boundary), as well as along the south-western boundary of Lot 2 near Building 2 include trees with a minimum mature height of 12m and spreading canopies.

The purpose of this requirement is for the tree canopies to provide screening to soften the visual impact of the built development on the views and setting of the heritage items in the vicinity.

In consulting the Moss Vale Enterprise Corridor Development Control Plan ('DCP'), we note that there is an inconsistency between the stated depth of the landscaped area required for this scenario between DCP Rule 4 of Section 3.10 Landscaping, and the landscaping example figure titled 'Scenario C' on page 17 of the same. The 3.10.4 control states the landscaped zone should be a minimum of 15m wide, while the 'Scenario C' figure indicates a 5m wide zone.

We have reviewed the landscape plan produced by Moir Landscape Architects and note that a 5m wide landscape zone has been adopted, and this is the proposal that the Visual Impact Assessment ('VIA') has been undertaken on.

As our expertise is in the assessment of heritage impact, we have only considered the parts of the proposal/VIA that concern the views and setting of the heritage items. As such, our peer review seeks to primarily determine:

1. The sufficiency of the aspects considered by the VIA and that of its conclusions and recommendations in respect of the visual impact of the proposal on heritage items in the vicinity; AND
2. Whether the 5m wide boundary landscaping zone and planting plan provides an adequate screening solution to reduce the visual impact of the built development on the views and setting of heritage items in the vicinity.

In this respect, we offer the following comments:

- The VIA has been undertaken by landscape architects who are suitably experienced in visual impact assessments.
- The VIA has been undertaken in line with the *Guidelines for Landscape Character and Visual Impact Assessment* (RMS, 2013); while the VIA considered the visibility of the proposal from the heritage items in the vicinity, the report should not be confused with, or used as, a Heritage Impact Statement which are per the NSW Department of Planning and Environment's 2023 *Guidelines for preparing a statement of heritage impact*.
- The heritage-related viewpoints ('VP') of the VIA are four indicated in Oldbury Road: VPs 10-13. These VPs look across the heritage-listed allotments of *Bonheur* and *Browley* toward the study site, and the assessment of these views are undertaken from page 31 – 37;
  - A limitation was noted on VIA page 4 that "Viewpoint locations for that of 254 and 270 Oldbury Road (*Bonheur*) have been supplemented due to denial of access to the property by the landowner". We assume this is the same for *Browley* as no VPs are recorded inside that property.
  - VPs 10-11 were taken from Oldbury Road, which is located in close proximity to the heritage significant buildings at *Bonhuer*, and afford a higher vantage point than the boundary shared with the client's land; in this respect they are a good test for the 'worst case' impact.
  - VPs 10-12 all include indicative cross section diagrams to demonstrate the topographic landforms and existing vegetation between the VP and the study site. The cross section and images show that in the 5 views considered from these 3 viewpoints that any potential views to the study site would be of the upper tree canopy of the 5m landscape zone; the lower parts of the study site being concealed by the topography or vegetation of the intervening landscape.

While the VIA did not take any viewpoints from just inside the client's western boundary shared with *Browley*, looking approximately NE and E toward the study site, this boundary and its topography is indicated in the cross sections, making it possible to approximate that, except for view 12A, views to the study site from the *Browley* E boundary are obstructed by topography and vegetation.

- View 12A, if taken from atop the earth mound indicated in the cross section (Image 26, p.35), would look down at the study site, but it would observe the landscaped buffer zone, and observe general industrial buildings in the context of similar buildings.
- Viewpoint 13 is taken from Oldbury Road from a point to the S of the built elements of *Browley*, looking NE. This is identified as having a partial view of the building, and is indicated in a diagram (Image 28, p.37). We are satisfied that view from VP13, indicative of a view from the SE extent of the *Browley* property, is sufficiently distant and partially obscured by topography, to be of low-to-nil impact on setting and views of the heritage item. This impact is further mitigated by the building's appropriately recessive cladding colour, and it's being set in an existing context of industrial buildings.

- The VIA does not specifically take in views of proposed Lot 1 and 2 from the NE 'triangle' of *Browley's* property that the study site will partially envelope. However, the triangle section has been considered in 8. Heritage on page 39

Aerials of the triangle indicate it is largely open pastoral land with a small dam and a scattering of trees; it is approximately 1.4kms from the significant buildings of the property. The land zone overlay indicates that the triangle is in the E4 General Industrial zone; as is the study site. The proposed works place industrial buildings in an existing general industrial zone; they will not be incongruous in this context.

The landscape plan provides a 5m landscape area along the boundaries shared with the triangle. The planting plan indicates the area will be planted with Australian Blackwood, Brittle Gum and Manna Gum, with the area between the tree trunks and bottom of the canopy of these medium and large trees to be mass planted with an understory of native grasses and shrubs that will grow to further soften the visual impact of the buildings.

The cladding of the buildings will be a 'pale eucalypt green', which is appropriately recessive background to the proposed boundary plantings.

As the triangle is an area of lesser heritage significance of the *Browley* property and is sufficiently removed from the significant residence and outbuildings of the site, the proposal will have a low impact on the setting and views of the heritage item. This impact is further mitigated by the proposed buildings being erected in an existing industrial context, ringed by a multi-level vegetative screen, and with an appropriately recessive cladding colour to blend into the landscape. We are satisfied with the VIA's assessments and statements to this effect on Page 39.

- We note that in addition to the 5m wide landscaped area being planted within the lot boundaries, there are street trees proposed for planting along Bowman and Hutchinson Road. The proposed trees are Brittle Gums, which have a mature height of 25-30m; these provide a further layer of screening to mitigate the visual impact of the built elements of the proposal on the views and setting of the heritage items in the vicinity. The layered screening effect of these street trees is demonstrated in the photomontage-style elevations of the proposal in Images 7-9 (p.13) and the Landscape Montage (p.14).
- The Assessment of Visual Impact concerning the heritage-related VPs (10-13) state that desktop modelling and a site visit confirmed that there will be no views from the dwellings on Oldbury Road (VPs10-12) and that while the study site would be partially visible from VP13, the impact of the views would be low against the existing industrial context. We are satisfied that this is a fair assessment based on the preceding documentation.
- The VIA conclusions acknowledge the change to the visual character of the site by the proposal, which is fair. Agree with the assessment and conclusions drawn about the overall negligible lighting impact with nil impact on the heritage items in the vicinity (per Light Spill Impact Assessment), that the topography, existing vegetation, siting in an existing industrial development, 5m wide landscaped area at boundaries and recessive green exterior colour finishes will result in overall visual impact being low.
- The VIA recommendations are fair and achievable:
  - That the landscape plan be implemented;
  - Landscape plan to ensure enough room for the establishment of medium and large canopy trees for screening;
  - Those medium-large trees be planted at an advanced height to establish some immediate canopy screening, with a view to reduce the time before the desired continuous, full canopy effect is established; and
  - The use of recessive colours for exterior building materials.

## Conclusions

We are satisfied that the VIA sufficiently considered and assessed the visual impact of the proposal, including light spill, on heritage items in the vicinity. The areas of greater significance at both *Bonheur* and *Browley* are around the residences and outbuildings; both of which are sited between 1.4 - 2kms from the study site; which is out of view for *Bonheur*, and partially visible near *Browley*.

The VIA considered and assessed the landscape and planting plan was adequate as a screening solution, and provided photomontage renders to demonstrate the medium-long term effect of that 5m landscaped buffer zone to boundaries. The inclusion of street trees at Bowman and Hutchinson Roads increases this effect.

We are satisfied that the proposed 5m wide landscaped area to boundaries and the corresponding planting schedule, combined with the recessive green exterior finished to the buildings, will achieve a multi-level vegetative screen to the buildings which will contribute a green border to the neighbouring rural zone, improving on the existing views to those boundaries.

The proposal is sited in an existing industrial zone, and will not be visually incongruous in that setting. The mitigative measures put forward by the architectural, lighting and landscaping designs are acceptable in softening the transition from rural to the industrial.

Overall, we are satisfied that the proposal does not pose an adverse impact on the views and setting of the heritage items *Bonheur* and *Browley*, in the vicinity of the site.

Do not hesitate to contact the undersigned if clarification is required.

Yours sincerely,



**Elizabeth Gorman B.A., M.A., M.ICOMOS**  
Associate Director  
**Sue Rosen Associates**