

TPC – POSS

Statement of agreed facts in relation to visual impact evidence (between Mr C. Goss, Orbit Solutions, Mr H. Saul and Mr B. Murphy, Murphy Landscape Consultancy)

1 The 3D model of proposed building

1.1 **Lighting:** agree that lighting is consistent between the photo time and place and the model's light time and place in both models.

1.2 **Materiality:** Saul used both Cox Architecture materials palette and Cox Architecture renders (as per submission.) Orbit only used the architect's materials palette. Consequently, the Orbit model is agreed to be more accurate in relation to materials.

1.3 **Form and mass:** Saul model relied on open source geometry that will be inherently less accurate than Orbit data. Agree that plan views are consistent between models but the 3rd dimension could vary between plus or minus 300 – 1000mm. Agree that this is a material difference that is not substantive for middle and long distance views but is substantive for closer views.

1.4 **Geometry:** Agree that Orbit model is more accurate because it was provided by the proponent. The Saul model followed POSS application data and therefore in any direct comparison of equivalent views, the Orbit model should take a higher weight of evidence.

1.5 **Camera:** Agree that Orbit is accurate due to survey alignment. The Saul model is less accurate as it has used visual alignment.

1.6 **Photomontage alignment:** The Saul photos are aligned visually, as opposed to the survey verified align view of the Orbit model. The Saul photos have a nominal focal length that results in an unverifiable level of accuracy in relation to the match of the alignment.

2 Photomontage interpretation

2.1 **Viewpoints:** Agree that all viewpoints from both parties are important in a considered evaluation of the proposal in its context.

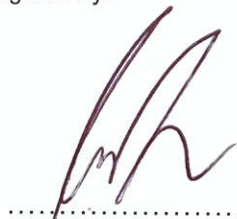
2.2 **Roof rendition:** The parties retain a difference of opinion of the importance of the reflectivity issue in relation to the roof ETFE.

Mr Goss confirms the consistency of the representation of the roof's structural elements with the digital model provided to him by the proponent.

2.3 **Focal length:** The parties retain a difference of opinion on the most appropriate focal length to adopt in the montages.

2.4 **Magnitude of Change:** The parties differ in their application of the term "moderate". Mr Goss uses the term "moderate" in the specific context of the analysis methodology used in his report. Mr Murphy uses the term "moderate" in a more vernacular understanding of the word.

Agreed by:



Mr Chris Goss
Orbit Solutions
30th June, 2025



Mr Hamish Saul



Mr Barry Murphy