

31 May 2024

Mary Garland
Team Leader, Transport and Water Assessments
NSW Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

Dear Mary,

**Response to Request for Information (DA 23/16891)
Digital Advertising Sign – Parramatta Road, Auburn**

This letter has been prepared by *Keylan Consulting Pty Ltd* (Keylan) on behalf of Transport for NSW (TfNSW) (the Applicant) to address the Department of Planning, Housing and Infrastructure's (DPHI) Request for Additional Information (RFI) dated 22 December 2023 in relation to Development Application (DA 23/16891).

A response to the issues raised in DPE's letter is detailed in the table at **Attachment A**.

This response should be read in conjunction with the following attachments:

- Attachment A: Response to issues raised by DPE
- Attachment B: Revised Lighting Impact Assessment
- Attachment C: Revised Signage Safety Assessment
- Attachment D: Supplementary Structural Feasibility Statement
- Attachment E: Approved signs - logo location examples
- Attachment F: Revised Architectural Plans
- Attachment G: Maintenance plan
- Attachment H: Revised Cost of Works

The response reinforces the findings of the SEE and supporting information, that the proposed digital advertising sign:

- will not adversely impact on the amenity of nearby areas
- demonstrates compliance and meets the objectives of Chapter 3 and Schedule 5 of the Industry and Employment SEPP
- will result in acceptable lighting, road safety and visual impacts
- will provide a public benefit to the community

We trust that this response provides sufficient information required for DPHI to finalise its assessment and approve the application.

Please do not hesitate to contact Lauren Donohoe at lauren@keylan.com.au should you wish to discuss any aspect of this project.

Yours sincerely

Padraig Scollard

Padraig Scollard BA MURP
Associate

Attachments:

- Attachment A: Response to issues raised by DPE
- Attachment B: Revised Lighting Impact Assessment
- Attachment C: Revised Signage Safety Assessment
- Attachment D: Supplementary Structural Feasibility Statement
- Attachment E: Approved signs - logo location examples
- Attachment F: Revised Architectural Plans
- Attachment G: Maintenance Plan
- Attachment H: Revised Cost of Works

Attachment A

Response to issues raised by DPE

Ref.	Issues raised	Response
1	<i>General</i>	
1.1	<i>I would like to draw your attention to the Cost of Works (Appendix 9 of the Statement of Environmental Effects). This document states 'The below undersign is a suitably qualified person that has prepared this Cost Summary and done so in accordance with Planning Circulars PS 21-020 and PS 21-022'. However, there is no evidence to support that the signatory is suitably qualified. Evidence should be provided that the person who signs the cost estimate is suitably qualified to do so (noting that the applicant is able to sign off on developments up to \$100,000).</i>	<p>The Estimated Cost of Development is provided at Attachment H and has been amended to:</p> <ul style="list-style-type: none"> refer to Planning Circulars PS 24-002 be signed off by TfNSW (as the Applicant) given the Estimated Cost of Development is less than \$100,000 (\$46,311) <p>It is noted that PS 24-002 now supersedes PS 21-022 and PS 10-020 referenced within the letter and has therefore been used.</p>
2	<i>Lighting Assessment</i>	
2.1	<p><i>Appendix C of the Lighting Impact Assessment (Appendix 4 of Statement of Environmental Effects (SEE)) makes reference to AS/NZS 4282:2019. This standard has since been superseded by AS/NZS 4282:2023.</i></p> <p><i>Provide an assessment of lighting/illumination impacts against the current standard.</i></p>	<p>A revised Lighting Impact Assessment (LIA) is provided at Attachment B which includes an assessment against the AS/NZS 4282:2023 standard. The LIA concludes the proposed sign complies with the daytime and nighttime luminance requirements outlined in this standard.</p> <p>On this basis, no adverse lighting impacts are expected as a result of the proposed development.</p>
2.2	<i>The Table of Contents of the Lighting Impact Assessment references an Appendix D. However, the appendix is not included in the report.</i>	Appendix D is now included in the revised LIA.
3	<i>Signage Safety Assessment</i>	
3.1	<i>The Signage Safety Assessment (Appendix 3 of SEE) states that the existing signs have been approved and designed in accordance</i>	A revised Signage Safety Assessment (SSA) is provided at Attachment C and refers to the conclusions of the Supplementary Structural Feasibility Statement Attachment D.

Ref.	Issues raised	Response
	<p>with Australian Standards AS 1170.1 and AS 1170.2 to meet requirements for wind loading.</p> <p>The current wind loading standard is AS/NZS 1170.2:2021 Structural design actions wind actions. It is not known whether the assessment was against the current standard or a superseded version. Please advise what version of the standard has been used.</p> <p>If the assessment was not against the current standard, provide an amended assessment against this. Where the sign does not meet current standard requirements, detail what mitigation measures will be implemented to ensure that the requirements are met and that the sign is safe.</p>	<p>Attachment D concludes that:</p> <ol style="list-style-type: none"> 1. ... The changes to AS1170.2 between 2002 and 2021 do not affect the determination of the wind load calculation on the signage structure. 2. The changes to AS4100 between 1998 and 2020 do not affect the structural sizing of the members or the connections design. 3. Structurally the signage structure is in accordance with current codes and the structural sections of the NCC. <p>Therefore, the sign has been suitably assessed against the standards and no additional mitigation measures are required.</p>
4	Structural Feasibility Assessment	
4.1	<p>The Structural Feasibility Assessment (Appendix 5 of SEE) is not based on the current Australian Standard for steel structures. The assessment states that AS 4100:1998 was used. This has been superseded by AS 4100:2020.</p> <p>Provide an amended assessment that assesses structural feasibility in accordance with the current standard. Based on the amended assessment, consider whether mitigation measures may be required to ensure that the sign is structurally sound and does not pose a safety issue. Any required measures must be included in the amended assessment.</p>	<p>A Supplementary Structural Feasibility Statement is provided at Attachment D. As outlined above, the report concludes that the proposal is also consistent with the most recent codes.</p> <p>On this basis, an amended assessment and additional mitigation measures are not required.</p>
5	Survey Plans	
5.1	<p>Survey plans have not been provided. Although architectural plans have been included, these do not include all of the relevant information to satisfy a survey plan.</p> <p>Please provide a survey plan</p>	<p>TfNSW in consultation with the Department discussed the cost and timing challenges of obtaining site surveys on this site. Given the scope of the proposed works is limited to the continuation of use of an existing advertising structure, it was agreed that with additional detail on the architectural plans that proposals could proceed without formal surveys</p>
6	Architectural Plans	
6.1	<p>The architectural plans do not provide sufficient details. The plans do not show the measurements of the sign and logo with respect to all adjacent structures and road infrastructure, nor do they show the</p>	<p>Additional details are now provided on revised Architectural Plans (refer Attachment F).</p>

Ref.	Issues raised	Response
	<p><i>logo dimensions and measurements. There is no detail on what the advertising and logo sign are made of. In addition, there are no architectural drawings of the internal aspects of the sign.</i></p> <p><i>It is noted that the location of the current logo is not compliant with the stamped plans of the previous consent (which has now lapsed).</i></p> <p><i>Please provide amended architectural plans which address the above.</i></p>	<p>Logo dimensions are also now provided on the Architectural Plans. The logo measures 0.612m².</p> <p>The location of the media operator logo, as proposed on the architectural plans submitted with the subject DA (and reflected in updated plans) is considered a suitable outcome for the following reasons:</p> <ul style="list-style-type: none"> • The stamped plans associated with the previous consent did not allocate a specific position for a media operator logo. Notwithstanding, the consent approved a logo (refer Condition A1 and D5). • The proposed logo aligns with the requirements of Condition D5 of the previous consent which requires the logo to “<i>appear only within the advertising display area</i>” of the sign. The proposed location to the side of the sign is within the <i>advertising display area</i> as it is located in ‘surrounds to’ the sign. • A media operator logo was constructed with the original sign in 2009 and has remained in a position offset to the side since this period. As no physical works are proposed as part of the application and the application only seeks to extend the duration of the consent, it is considered best practice to leave the sign and logo as is. • If the media operator logo were to be positioned in an alternate location, such as in a banner format below the sign, this would increase the height of the asset towards the road and traffic passing below. • It is not uncommon for media operator logos to be located to the side of signs. A suite of approved examples of NSW sites is provided at Attachment E.
7	Statutory Planning Framework	
7.1	<p><i>Table 5, Page 19 of the SEE – Provision (a)(iv) states that the application is consistent with the relevant matters of the EP&A Regulation. Please provide details on what the relevant matters are and how the application is consistent.</i></p>	<p>The proposal is compliant with the relevant matters of the <i>Environmental Planning and Assessment Regulation 2021</i> as outlined below:</p> <p>Part 3, Division 1:</p> <ul style="list-style-type: none"> • <i>Clause 23 Persons who may make development applications</i>

Ref.	Issues raised	Response
		<ul style="list-style-type: none"> ○ the DA accompanies written consent from the owner of the land • <i>Clause 24 Content of development applications</i> <ul style="list-style-type: none"> ○ the proposal is in the approved form, contains the relevant information and paid the relevant fees ○ it is presumed DPHI, as the consent authority have given Council a copy of the DA • <i>Clause 25 information about concurrence or approvals</i> <ul style="list-style-type: none"> ○ concurrence is not explicitly required to undertake concurrence as part of the DA, given it is a crown DA • <i>Clause 36 Consent authority may request additional information from the application</i> <ul style="list-style-type: none"> ○ this letter forms part of a response to request for additional information form the consent authority • <i>Clause 294 Crown development</i> <ul style="list-style-type: none"> ○ the proposal is on behalf of a public authority and therefore clause 294(a) applies
7.2	<p><i>Table 6, Page 25 of the SEE – Item 6 does not address if any safety devices, platforms or lighting devices have been designed as an integral part of the signage or structure on which it is to be displayed. The comments only refer to the logo being included and to content controls for signage (which does not form part of the consideration). Provide details on the safety device, platforms and any lighting devices.</i></p>	<p>No physical works are proposed as part of this application and the existing safety, platform and lighting systems will remain. Further details on each are provided below:</p> <p>Safety devices</p> <ul style="list-style-type: none"> • There is a safety screen fixed to the bridge to prevent objects from being thrown onto the road. The sign box is located on the outside of the safety screen. Access to the sign box is from a hatch in the side of the safety screen, a platform between the safety screen and the box and a hatch in the top of the box. Refer to photos 2 and 3 in the original Structural Feasibility Statement submitted with the DA. • When the sign banner is replaced, it is done from a walkway inside the box without having to stop the traffic below the sign. There is a horizontal cable running the length of the box that workers replacing the banner can fix their harnesses to when the banner is removed. <p>Platforms</p>

Ref.	Issues raised	Response
		<ul style="list-style-type: none"> An internal platform is located within the sign to allow maintenance personnel to access the sign. Internal photographs of the sign are provided within the original Structural Feasibility Statement submitted with the DA <p>Lighting devices</p> <ul style="list-style-type: none"> The existing sign will be internally lit. No lighting devices external to the sign are proposed. Internal photographs of the sign which show the internal lights are provided within the original Structural Feasibility Statement submitted with the DA.
8	<i>Maintenance</i>	
8.1	<i>Provide details on the proposed maintenance regime for the sign.</i>	A Maintenance Plan has been prepared for the sign and is provided at Attachment G. This plan provides details of electrical and structural repair works as well as general maintenance and reporting.