

4 July 2022

Anthony Witherdin  
Director, Key Sites Assessments  
NSW Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Attention: David Glasgow  
[davis.glasgow@planning.nsw.gov.au](mailto:davis.glasgow@planning.nsw.gov.au)

Dear Mr Witherdin,

**Response to Submissions (DA22/1842)**  
**Digital Advertising Sign - Gore Hill Freeway Railway Overpass, Artarmon**

This letter has been prepared by *Keylan Consulting Pty Ltd* (Keylan) on behalf of Sydney Trains (the Applicant) to address the Department of Planning and Environment's (DPE) request for a Response to Submissions (RtS) dated 3 June 2022 in relation to Development Application (DA22/1842).

We note that the application received only one submission from Willoughby City Council (Council). A detailed response to the issues raised in the submission is provided at **Attachment A**.

Additionally, we note concurrence has been received from Transport for NSW (TfNSW) which raises no objection to the proposal. The Applicant has reviewed TfNSW's requested conditions of consent and raises no objection to their inclusion in the development consent.

**Key issues**

The submission raises the following key issues:

- concerns regarding road safety noting the nearby merge point
- illumination impacts
- compliance with AS 4282-2019 and the *Transport Corridor Advertising and Signage Guidelines 2017* (Signage Guidelines).

*Response*

The nearby merge point between the Pacific Highway on-ramp and the Gore Hill Freeway is considered in detail within the *Traffic Safety Assessment* (TSA) prepared by Bitzios Consulting. The TSA concludes the digital sign is acceptable on traffic safety grounds and will not result in significant distraction to drivers merging at this point.

Furthermore, the application is also accompanied by a *Lighting Impact Assessment* (LIA) prepared by Electrolight which confirms the proposal complies with the relevant illumination criteria and concludes the proposal will not result in unacceptable or unreasonable visual impacts or traffic safety impacts.

Based on the above expert reports accompanying the application, our assessment concludes that the proposed sign will not result in unacceptable illumination or road safety impacts. The operation of the sign will also comply with AS 4282-2019 and the Signage Guidelines.

The RtS 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 (former SEPP 64)
- will result in acceptable lighting, road safety and visual impacts
- will provide a public benefit to the community

We trust that the RtS provides sufficient information required for DPE to finalise its assessment and approve the application.

Please do not hesitate to contact Pdraig Scollard on 8459 7508 or via email at [pdraig@keylan.com.au](mailto:pdraig@keylan.com.au) should you wish to discuss any aspect of this project.

Yours sincerely



Michael Woodland BTP MPIA  
Director

**Attachments:**

**Attachment A:** Response to Submission

## Attachment A

### Response to Submissions

A total of 1 submission was received on the application from Willoughby City Council (Council). The issues raised in the submissions are addressed in the table below.

Ref.	Issues raised	Response
<b>A</b>	<b>Willoughby City Council (BOLD our emphasis)</b>	
A1	<p><i>My position is that Council should indicate strong concerns with the DA as the sign is in the view and area of influence that eastbound motor vehicle drivers need to undertake a merge movement along the Gore Hill Freeway (M1), this is shown on the photograph below.</i></p> <p><i>The M1 in this location has a 80 km/h speed limit and carries high traffic volumes of all classifications. The replacement of the static sign with a digital sign will be more distracting and therefore reduce the level of safety at this location.</i></p> <p><i>I am not proposing that we ‘object’ to the sign as, due to its location, this is really a matter for NSW Government agencies to resolve.</i></p>	<p>The application is accompanied by a Traffic Safety Assessment (TSA) prepared by Bitzios Consulting. The TSA notes the merge with the Pacific Highway on-ramp is the nearest decision point within view of the site which is located 70m before the sign. The TSA assesses likely impacts related to this decision point and notes:</p> <p><i>“If vehicles are approaching from Lane 2 and need to merge they will saccade their views between their right side mirror, possibly also turning their head over their left shoulder as well, to accelerate, or decelerate to accept gaps to merge into.</i></p> <p><i>This usual process of merging would be unaffected by a change in the digital display on the sign because, merging drivers would need to return their view to the front anyway from time to time.</i></p> <p><i>Even though it is improbable that drivers would glance at the digital sign when concentrating on merging, if they did, such a glance would not extend their forward view duration to the extent that it would reduce their merge-related glances, given that all forward glances to traffic and the digital sign would occur in exactly the same view.</i></p>

Ref.	Issues raised	Response
		<p><i>That is, the digital sign would not be a significant distraction, and this is a movement/area of relatively low cognitive load (i.e. just the decisions needed for merging)”</i></p> <p>In response to concerns that the digital sign would be more distracting than a static sign, a compliant 25 second dwell time is proposed to ensure motorists do not witness multiple message changes. Furthermore, the screen will have a transition time of no more than 0.1 seconds to ensure motorists are not distracted.</p> <p>It is therefore considered that the proposed sign is unlikely to reduce road safety at this location.</p> <p>We note advice from the relevant NSW Government Agency, TfNSW, has been received and they have no objection to the proposal.</p>
A2	<p><i>Other planning matters such as the brightness of the sign was mentioned by Jenny Yuan which I am not in a position to respond. There could be other planning matters to be considered as well.</i></p>	<p>The brightness of the sign will be controlled in accordance with AS 4282-2019 and the Signage Guidelines.</p> <p>The Lighting Impact Assessment (LIA) prepared by Electrolight confirms the proposal complies with the relevant illumination criteria and concludes the proposal will not result in unacceptable or unreasonable visual impacts or traffic safety impacts.</p> <p>All relevant planning matters have been considered within the SEE submitted with the application.</p>
A3	<p><i>Please also ensure that the operation of the digital sign complies with the requirements of AS 4282-2019 and the Transport Corridor Advertising and Signage Guidelines 2017</i></p>	<p>The operation of the digital sign will comply with the requirements of AS 4282-2019 and the Signage Guidelines.</p>