



17 August 2022

Keiran Thomas
Director, Regional Assessments
NSW Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

Attention: Tom Scoble
thomas.scoble@dpie.nsw.gov.au

Dear Mr Thomas,

Response to Submissions (DA22/5177)
Digital Advertising Sign – Princes Highway, Bombo

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) and additional information dated 4 August 2022 in relation to Development Application (DA22/5177).

We note that the application received submissions from Kiama Municipal Council (Council), Heritage NSW and Transport for NSW. A detailed response to the comments provided in the submissions are provided at **Attachment A**.

The submissions received did not object to the proposal but provided comments and suggested conditions of consent. Heritage NSW and Transport for NSW's suggested conditions of consent have been reviewed and are considered acceptable.

Council's submission raised issues regarding the potential for dynamic images rather than static images to be displayed on the sign. This RtS reiterates that only static images will be displayed on the sign.

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
- 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 further its assessment and approve the application.



Please do not hesitate to contact Pdraig Scollard on 8459 7508 or via email at padraig@keylan.com.au should you wish to discuss any aspect of this project.

Yours sincerely

A handwritten signature in black ink, appearing to be "M Woodland".

Michael Woodland BTP MPIA
Director

Attachments:

Attachment A: Response to Submissions

Attachment A -Response to Submissions

A total of 3 submissions were received on the proposal including from Kiama Municipal Council, Heritage NSW and Transport for NSW. The issues raised in the submissions are addressed in the table below.

Ref.	Issues raised	Response
A	Kiama Municipal Council	
A1	<i>Our Road Safety Officer has reviewed the proposal, and concluded that the proposed digital sign will be highly visible from this location. While visual impacts have been identified and represent minor changes to the existing sign with an overall positive impact resulting from a smaller and higher quality advertising display, the risk of driver distraction must be taken into consideration. From a Road Safety perspective (Reference: Transport Corridor Outdoor Advertising and Signage Guidelines 2017).</i>	Noted, detailed consideration of road safety was provided within the Digital Signage Safety Assessment prepared by TTPP and submitted with the original application. This assessment concluded that the proposal is acceptable in terms of traffic and road safety requirements.
A2	<ul style="list-style-type: none"> <i>It is recommended that the installation of Digital Advertising signage at the identified location, if approved by Council, should be a static electronic display, – these display static images only, which are presented successively at set intervals. They do not contain or imply motion such as vertical or horizontal scrolling, fade, dissolve or animation within the message itself; and do not have any movement of any part of the advertising structure or surrounds with the aim to reduce the risk of driver distraction.</i> 	The proposed sign will only display static images which will have a dwell time of 25 seconds. There will be a 0.1 second transition time between images which will appear instantaneous.
A3	<ul style="list-style-type: none"> <i>non-static (dynamic) electronic displays – these display animations, videos, flashing, and have active display changes. These signs can be either permanent or portable, including any signs which contain any portion of video and/or animated content. Those that face the road reserve and are visible to road users are prohibited.</i> 	No dynamic images will be displayed on the proposed digital advertising sign.
A4	<ul style="list-style-type: none"> <i>Council Development Application approval and Transport for NSW concurrence also applies.</i> 	In this instance, the consent authority is the Minister for Planning and Homes, rather than Council. Concurrence from Transport for NSW was received on 6 June 2022.

Ref.	Issues raised	Response
B	Heritage NSW	
B1	<p><i>As delegate of the Heritage Council of NSW, I provide the following comments:</i></p> <ul style="list-style-type: none"> <i>A statement of heritage impact was not submitted with the application.</i> <i>No overlay mapping showing the proposed sign location in relation to the SHR curtilage was provided in the submission. Comparison between the aerial provided within the engineering plans and comparison with the SHR curtilage map indicates that the existing sign (and proposed replacement sign) is located approximately 100m to the south of the SHR curtilage, as per discussed in the SEE.</i> <i>It is noted that the subject site and the SHR item share the same Lot and DP description, however the SHR item only applies to the central area of this allotment.</i> <i>The SEE advises that the screen size of the existing static sign is 18m² (6.0m x 3.0m), while the proposed digital sign would be 16.25m² (7.9m x 2.0m). The existing height is noted to be 7.11m high, while the proposed height would be 6.85. Therefore, the proposal is not anticipated to result in additional visual impact upon the SHR item.</i> 	<p>The comments provided from Heritage NSW are noted. As discussed in the SEE, the proposal is not anticipated to result in adverse heritage impacts to the Bombo Railway Station Group.</p>
B2	<ul style="list-style-type: none"> <i>No information has been provided in relation to impacts upon potential historical archaeology. It is recommended that any approval for this project include the following condition to manage the unexpected discovery of historical archaeological information:</i> <p><i>Unexpected historical archaeological relics protection</i> <i>The applicant must ensure that if unexpected archaeological deposits or relics not identified and considered in the supporting documents for this approval are discovered, work must cease in the affected area(s) and the Heritage Council of NSW must be notified. Additional assessment and approval may be required prior to works continuing in the affected area(s) based on the nature of the discovery.</i></p>	<p>The proposed condition of consent is considered acceptable.</p>

Ref.	Issues raised	Response
B3	<ul style="list-style-type: none"> As the site is in the vicinity of local heritage items, advice should be sought from the relevant local council. 	Noted, a submission was received from Kiama Municipal Council which did not raise any objections to the proposal. In particular, no heritage concerns were raised.
C	Transport for NSW	
C1	<p><i>TfNSW notes:</i></p> <p>...</p> <ul style="list-style-type: none"> There has been previous correspondence involving TfNSW (RMS), Sydney Trains and JCDecaux to discuss and identify issues with digital signage at this location; and The proposal to install sensors that detect car movements to prevent the digital displays from changing when there is a car waiting to leave the Bombo Station commuter car park will help to mitigate the safety concerns that were raised during the previous correspondence. 	Noted, the sensor to detect car movement is proposed as a direct response to safety concerns regarding drivers exiting the Bombo Station commuter car park.
C2	<p>Having regard for the above, TfNSW will not object to this proposal and issues its concurrence subject to the conditions outlined in Attachment 3 being included in the conditions of development consent.</p>	Noted, the Applicant has reviewed the proposed conditions of consent provided by TfNSW and has no objections.