KEYLAN
43A The Corso
Manly NSW 2095

3 November 2022

Louise Densmore
Team Leader, Regional Assessments
NSW Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

Attention: Clay Logan,
clay.logan@planning.nsw.gov.au

Dear Ms Densmore,

**Response to Request for Information (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 Additional Information (RFI) dated 23 September 2022 in relation to Development Application (DA22/5177).

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

- **Attachment A:** Response to matters raised by DPE
- **Attachment B**: Waste Management Plan
- **Attachment C:** Structural Feasibility Statement
- **Attachment D**: Amended Architectural Plans

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 provide a public benefit to the community
- will be structurally sound
- will follow waste management procedures

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

Please do not hesitate to contact Padraig Scollard on 8459 7508 or via email at padraig@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 matters raised by DPE
**Attachment B**: Waste Management Plan
**Attachment C**: Structural Feasibility Statement
**Attachment D**: Amended Plans

***Attachment A***

***Response to matters raised by DPE***

| Ref. | Issues raised | Response |
|---|---|---|
| 1 | *A structural feasibility statement prepared by a suitably qualified expert which:*<br>• *assesses and determines the structural feasibility of the proposed signage;*<br>• *addresses the structural requirements for the proposed signage including height, required supporting structures, self-weight of the required post and total weight of the signage and structure;*<br>• *assesses the wind loading for the site and any requirements as a result; and*<br>• *provides any recommendations from the expert, including methodology for excavation and construction* | • A Structural Feasibility Statement has been prepared by Dennis Bunt Consulting Engineers is provided at **Attachment C**<br>• The statement finds:<br>  ○ the sign will be self-supported by a single column bolted to a concrete footing that is approximately 4m$^2$ and 1.5m deep and on relatively flat ground in between the road crash barrier and the Sydney Trains track<br>  ○ the weight of the structure, including digital screens and the cladding is approximately 7 tonnes and the weight of the support structure is approximately 1 tonne<br>  ○ the sign will be designed for a wind load for region A, terrain category 2.5 and a 50 year design life accordance with AS1170.2<br>  ○ excavation will occur between the road crash barrier and the Sydney Trains track on relatively flat land and will allow for the installation of the concrete footing<br>• The statement concludes that based on the survey and preliminary design Dennis Bunt Consulting Engineers find no reason why the cantilevered signage cannot be installed<br>• The statement includes the following recommendations:<br>  ○ a geotechnical report is commissioned to provide information on the soil and its profile<br>  ○ a services search is undertaken in the area of the footing<br>• A suitable condition of consent can be imposed required the recommendations of the Structural Feasibility Statement to be satisfied prior to the issue of a Construction Certificate<br><br>Based on the above technical assessment, the proposal is considered acceptable in this location in relation to structural feasibility. |
| **2** | *Amended plans that notate:*<br>• *the depth and extent of proposed excavation;*<br>• *the width of the footings/base of the proposed signage structure;*<br>• *details of the pilings required to support the proposed signage; and* | • Amended plans are provided at **Attachment D** |

| Ref. | Issues raised | Response |
|---|---|---|
| | • *details of the materials of the proposed signage and structure.* | |
| **3** | *Demolition information, including:*<br>• *a revised statement of environmental effects (SEE) that describes the demolition in detail and any relevant planning provisions;*<br>• *amended supporting documentation and demolition plans to reflect any demolition of the existing signs and associated structures*<br>• *a waste management plan describing how demolition will be undertaken, including types and volumes of waste, details of how waste will be disposed of and/or recycled, details of how waste will be managed on site, and*<br>• *identifying on the demolition plans the location of any temporary waste storage area/s.* | • A Waste Management Plan (WMP) is provided at **Attachment B**<br>• The WMP details the demolition management, reuse of materials and waste management<br>• A demolition plan is provided in the Amended Plans at **Attachment D** which details the demolition of the existing sign and location of any temporary waste storage areas<br><br>Based on the above technical assessment, the proposal is considered acceptable in this location in relation to demolition works. |

***Attachment B***

***Waste Management Plan***

This Waste Management Plan (WMP) has been prepared to inform the waste management of the disassembly, demolition, removal, and ongoing operation of the proposed digital signage asset, including:

- details on waste type and volume
- the reuse and recycling potential of the waste
- how and where construction wastes will be disposed of

The WMP has been prepared in accordance with Kiama Municipal Council's *Waste Management for Proposed Development Guideline 2021* and has considered the following aims and objections from the guideline:

- *maximise avoidance, reuse, recycling of building/construction materials and industrial/commercial waste, and to minimise disposal of materials*
- *support resource conservation and foster the principles of ecological sustainable development (ESD)*
- *encourage selective or complete deconstruction rather than straight demolition of buildings*
- *facilitate improved project planning, purchasing and management resulting in efficient use of resources, efficient building techniques and waste minimisation*
- *contribute to state-wide initiatives to achieve the target aims for waste reduction and resource recovery and reuse as specified in the NSW Waste Avoidance and Resource Recovery Strategy 2014-2021*

*Waste Reduction*

JCDecaux Australia and its contractors reduce consumption of resources that have the potential to become waste as a standard practice throughout their operations minimising the waste generated by the installation and disengagement of assets. Reduction strategies include:

- maximising the use of materials from a sustainable source, that are, and/or can be, recycled
- examining each work process step to determine where wastes are produced and to devise measures for waste prevention or reduction
- minimise the use of solvents, glues, paints and other materials which release odours or vapour Isopropyl Alcohol (Class 3)
- partnering with a waste management contractor to assist with waste minimisation
- quantifying and recording the waste produced to track changes and improvement

To monitor the implementation of the above waste reduction strategies and in the meantime fulfilling its JCDecaux's own corporate regulatory obligations, JCDecaux Group performs comprehensive internal extra-financial reporting on a quarterly basis. This extra-financial reporting requires all global business units, including JCDecaux Australia, to provide concrete data for environmental indicators such as waste reduction.

*Reuse*

JCDecaux Australia's digital signage infrastructure components are made from high quality, highly durable materials designed to make the components last beyond the calculated lifespan of the asset.

JCDecaux identifies such components of the infrastructure and puts processes in place to ensure their consistent re-use as follows:

- reusing any components of the infrastructure for maintenance, where possible
- selling or donating usable components to other organisations
- redeploying assets to other contracts, where permissible

Internal maintenance staff or third-party supply contractors disassemble and assess each asset in collaboration with third-party engineers for structural integrity, functionality and ease of redeployment.

A life cycle assessment is then performed on those assets or components of assets deemed structurally reusable to determine whether to reuse, sell on or redeploy. Factors included in the decision making are:

- uniformity of components
- complexity of refurbishment or redeployment
- quantity of usable components
- proximity and scale of redeployment opportunities
- resource and material value,
- collection and Reprocessing cost
- cost benefit analysis

Items to be reused but not immediately redeployed may be stored for up to 36 months at JCDecaux storage facilities located at Sydney and Melbourne. JCDecaux also redeploy parts or components of assets to other countries if cost benefits allow and overseas redeployment does not negatively impact JCDecaux's carbon footprint.

*Recycling*

Where reuse of components removed from signage is deemed unfeasible JCDecaux actively identifies and separates its waste stream daily and this allows the materials to be collected and taken to facilities that reprocess the material for use in new products.

JCDecaux contributes to the three main types of recycling:

- primary recycling - materials are used to create the same product
- secondary recycling - materials are reused for make a different product
- tertiary recycling - materials are broken down chemically to create a new product

Primary recycled items include ferrous steel components which is hauled from the storage's facilities on stillages to various scrap metal yards across Sydney. Recycling ferrous metals has many financial and environmental benefits. Most importantly it reduces the need to extract and manufacture raw materials and contributes to significant savings in greenhouse gas emissions.

Other Primary recycled items include LED electronic components and associated equipment which are recycled by suitably qualified resource recovery agents or third-party suppliers.
Secondary recycled items include plastics which can be used specifically to manufacture Corflute products within Australia and overseas.

Where applicable, tertiary recycled, or chemical recycled items include PVC vinyl banner material and glass that cannot cost-efficiently be recycled into new PVC or glass products. For example, Campbelltown recyclers on sell the recycled glass to Bradford for the manufacturing of Insulation Batts.

*Disposal*

JCDecaux is committed to ensuring the waste and recyclables are managed in a responsible and effective manner.

JCDecaux Australia will dispose of waste in accordance with the company Waste Management Procedure:

- General waste is handled appropriately and stored in the bins provided for collection by an authorised service provider for transport to a facility appropriate for the purposes of disposing of that waste
- Separated Waste is to be disposed of in the appropriate bins/ways such that it can be recycled/reused. Disposal of this waste is considered the least desirable option.

JCDecaux Australia considers disposal as a last resort and is actively working on increasingly minimising such waste as this generally means that the waste is sent to landfill.