



7 March 2022

Michael Doyle
Acting Team Leader, Regional Assessments
NSW Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

Dear Michael,

**Response to Submissions and Request for Information (DA22/14349)
Digital Advertising Sign – Pacific Highway, Lindfield**

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) Response to Submissions (RtS) request dated 13 December 2022 and Request for Information (RFI) dated 21 December 2022 in relation to Development Application (DA22/14349).

We note that the application received submissions from Ku-ring-gai Council (Council) and Transport for NSW (TfNSW), as well as one public submission. A detailed response to the comments provided in the submissions are provided at **Attachment B**.

The submissions received from Council and TfNSW did not object to the proposal but provided comments and suggested conditions of consent.

The public submission received is an objection to the proposal, however a detailed response is provided which adequately addresses the submitter's concerns. This RtS reiterates that the proposed sign will be orientated towards traffic travelling northbound along the Pacific Highway.

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

- will result in acceptable road safety impacts for northbound traffic on the Pacific Highway, Lindfield
- is not considered to adversely impact on the amenity of nearby areas, including land zoned R4 High Density Residential and B4 Mixed Use
- will result in acceptable lighting and visual impacts to surrounding properties, including Lindfield Avenue

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 Departments RFI
- Attachment B:** Response to Submissions
- Attachment C:** Visual Assessment – 37 Lindfield Avenue
- Attachment D:** Updated Lighting Impact Assessment
- Attachment E:** Preliminary Geotechnical Report
- Attachment F:** Updated Architectural Plans

Attachment A

Response to DPE

Ref.	Issues raised	Response
A	DPE	
A1	1. Demolition <ul style="list-style-type: none"> • Detailed information regarding demolition and a demolition plan. 	Updated Architectural Plans are provided at Attachment F. The plans provide details of the proposed demolition.
A2	2. Geotechnical <ul style="list-style-type: none"> • Provide a preliminary geotechnical report prepared by a suitably qualified expert which identifies the ground conditions, the proposed depth and extent of excavation, makes recommendations for undertaking excavation and construction and, if applicable, makes recommendations for the supporting structure of the proposed signage. 	<p>A Preliminary Geotechnical Report is provided at Attachment E.</p> <p>The report provides a general overview of the subsurface geotechnical conditions likely to be encountered at the proposed structure location.</p> <p>The report also discusses the potential footing system operations.</p> <p>It is noted that the report recommends that further detailed site investigations be undertaken at a later stage of the project to provide detailed geotechnical information for design and construction purposes. It is considered that these investigations can be undertaken post approval of this DA, subject to suitable conditions of consent.</p>
A3	3. Amended Plans and Documentation <ul style="list-style-type: none"> • Amended plans that notate: <ul style="list-style-type: none"> ○ the precise location of the proposed sign and existing signs to be demolished, including distances between signs as well as surrounding structures such as power line poles; ○ demolition plans; ○ the depth and extent of proposed excavation ○ the width of the footings/base of the proposed signage structure; 	<p>Updated Architectural Plans are provided at Attachment F. The revised plans address the requirements outlined by DPE.</p> <p>The community concerns raised during exhibition are addressed in detail at Attachment B to this letter.</p> <p>Ku-ring-gai Council's concerns are also addressed in detail at Attachment B.</p>

Ref.	Issues raised	Response
	<ul style="list-style-type: none"> ○ <i>details of the pilings required to support the proposed signage; and</i> ○ <i>details of the materials of the proposed signage and structure.</i> ● <i>Consider and address community concerns raised during exhibition regarding illumination and amenity impacts on nearby residences.</i> ● <i>Consider and address Council's concerns regarding vehicle safety and suitable hours of operation</i> 	

Attachment B

Response to Submissions

A total of 3 submissions were received on the proposal, a submission from Ku-ring-gai Council, a submission from Transport for NSW and one public submission. The issues raised in these submissions are addressed in the table below.

Ref.	Issues raised	Response
A	Ku-ring-gai Council	
A1	<i>The proposed large 14.93 sqm LED sign has the potential to distract motorists and impact upon road safety. The application should only be approved if Transport for NSW have assessed the potential impacts of the proposal on road safety and are satisfied that the proposal will not result in any adverse impacts upon road safety for northbound traffic on the busy Pacific Highway, Lindfield.</i>	<p>As part of the assessment process, TfNSW have assessed the proposal and subsequently provided their concurrence.</p> <p>TfNSW's comments and recommended conditions are provided below.</p>
A2	<i>The proposed sign is close vicinity to land zoned both R4 (High Density Residential) as well as B4 (Mixed Use), and any approval should include conditions to allow for the imposition of a curfew to address unanticipated light spill impacts to the existing and proposed residential properties.</i>	<p>The Lindfield Village Hub Planning Proposal (PP-2020-866) is addressed in the Visual Impact Assessment (VIA) provided at Appendix 5 of the DA lodgement package.</p> <p>Visual impacts as a result of the proposed sign are considered to be low from this location for the following reasons:</p> <ul style="list-style-type: none"> • The proposed digital advertising sign will face south, and therefore future building located at the Planning Proposal site are not anticipated to have direct views towards the sign as they will face east. • Existing buildings fronting the Pacific Highway as well as existing vegetation will likely restrict views towards the sign from the lower levels of future buildings at the Planning Proposal site. • The DA proposes to rationalise signage and therefore will result in an improved outcome as potential views from the Planning Proposal site will view one sign instead of four.

Ref.	Issues raised	Response
B	TfNSW	
B1	<i>The proposed signs design and operation shall be in accordance with the Transport Corridor Outdoor Advertising and Signage Guidelines 2017 requirements.</i>	Noted.
B2	<p><i>The images displayed on the sign must not contain/use:</i></p> <ul style="list-style-type: none"> • <i>Flashing or flickering lights or content.</i> • <i>Animated displays, moving parts or simulated movement.</i> • <i>Complex displays including text and information that hold a driver's attention beyond "glance appreciation".</i> • <i>Displays resembling traffic control devices by use of colour, shape or words that can be construed as giving instruction to traffic for example, red, amber, or green circles, octagons, crosses, triangles and words such as 'stop' or 'halt'.</i> • <i>A method of illumination that distracts or dazzles; and</i> • <i>Dominant use of colours red or green.</i> 	Noted.
B3	<i>Dwell times between displays shall be no shorter than 10 seconds</i>	Noted and agreed.
B4	<i>A Road Occupancy Licence (ROL) should be obtained from Transport Management Centre for any works that may impact on traffic flows on Pacific Highway during construction activities. A ROL can be obtained through https://myrta.com/oplinc2/pages/security/oplincLogin.jsf</i>	Noted and agreed.
C	Public submission	
C1	<p><i>I want to object to the application or have the advertising signage slightly amended.</i></p> <p><i>I run a business and also own a property at 37 Lindfield Avenue, Lindfield.</i></p> <p><i>I appreciate this application with great detail, including light impact assessment. According to the information provided, it seems like the signage angle will also generate spill light which will impact the corner of 37 Lindfield Avenue residents (the residents above Lindfield Village</i></p>	<p>View impacts on Lindfield Avenue were assessed in the VIA at Appendix 5 of the original application. Notwithstanding, additional information is provided below at Attachment C.</p> <p>Figure 1 at Attachment C provides an aerial image of the site and surrounds, and Figure 2 provides an indicative photomontage from the lower level of 37 Lindfield Ave.</p>

Ref.	Issues raised	Response
	<p><i>where the current IGA stands). In particular, the signage is approximately 50m to Lindfield Avenue residents and the signage operating hours as 24/7, spill lights will also create light pollution for 37 Lindfield Avenue residents. There are numerous 37 Lindfield Avenue residence bedrooms facing Pacific Highway. Hence, spill lights towards bedrooms can also be a nuisance to residents and may also trigger insomnia. But this has been glossed over in Appendix 5.</i></p> <p><i>If the signage could either move a little bit southbound closer to the bus station or the existing signage. Or consider changing the hours of operation might help remove spill lights for the residents nearby.</i></p>	<p>Impacts on the lower levels of 37 Lindfield Ave are considered negligible as the topography of the land and existing mature vegetation blocks most views of the sign (Figure 2).</p> <p>Impacts on the upper levels of the building are also considered minimal as:</p> <ul style="list-style-type: none"> • The proposed sign will be orientated south to face northbound traffic. It is noted, 37 Lindfield Avenue is located to the east of the sign as shown in Figure 1 below. • It is expected that any views of the sign will be limited to the side and rear panels which will be black and non-illuminated. The proposal is one-sided and there will be no advertising material located at the rear. <p>Further to the above, an updated Lighting Impact Assessment (LIA) is provided at Attachment C to this letter.</p> <p>The LIA demonstrates that 37 Lindfield Avenue will experience a luminance rating of 0.1 lux as a result of the sign. It is noted this is well below the maximum 2 lux as per the Australian Standards and therefore is considered appropriate.</p>

Attachment C
Visual Assessment - 37 Lindfield Avenue

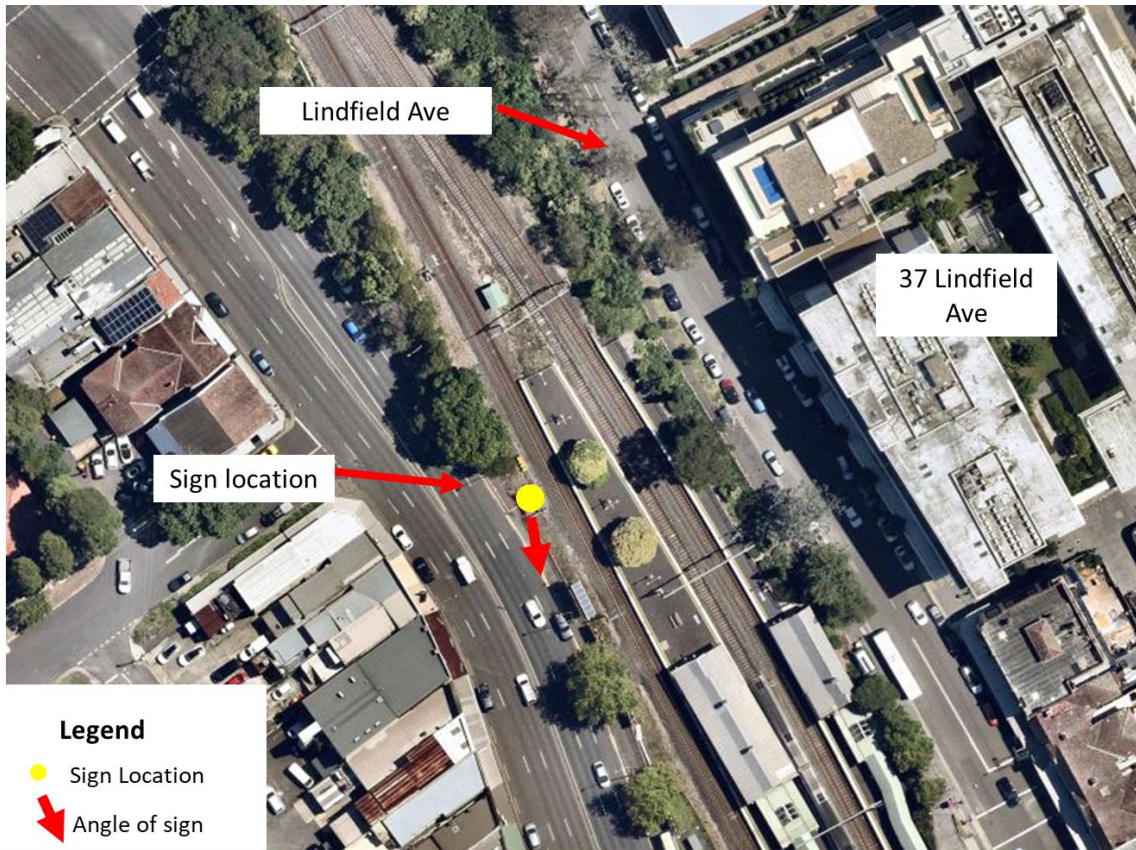


Figure 1: Aerial image with annotations (Source: Nearmaps and Keylan)



Figure 2: Proposed view looking west towards the site from ground level Lindfield Ave (Source: JCDecaux)