

5 May 2023

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

Attention: Janith De Silva (janith.desilva@planning.nsw.gov.au)

Dear Mr Witherdin,

**Response to Request for Information (DA22/14950)
Digital Advertising Sign –Hume Highway, Ashfield**

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 (DPE) request for a Response to Submissions (RtS) and Request for Information (RFI) dated 23 February 2023 in relation to Development Application (DA22/14950).

In response to DPEs request, design amendments have been made to reduce the overall height and depth of the sign. Specifically, the height of the sign has been reduced by 258mm to total 7.8m and the width has been significantly reduced by 900mm to total 450mm. The substantial reduction in the height and depth of the signage will assist in minimising potential visual and adverse amenity impacts.

Further, the Applicant proposes to provide substantial planting and landscaping improvements, including fencing upgrades along the northern side of the railway corridor. These proposed improvements will soften the interface between the sign and the residential properties along Grosvenor Crescent and will improve the visual quality of the public domain.

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

- **Attachment A:** Response to issues raised by DPE
- **Attachment B:** Response to Submissions
- **Attachment C:** Revised SEPP and Signage Guidelines assessment
- **Attachment D:** Revised Architectural Plans
- **Attachment E:** Revised Landscape Plans
- **Attachment F:** Revised Lighting Impact Assessment
- **Attachment G:** Revised Traffic Safety Assessment
- **Attachment H:** Structural Feasibility Statement
- **Attachment I:** Revised Visual Impact Assessment
- **Attachment J:** Preliminary Geotechnical Investigation Statement
- **Attachment K:** Revised Survey Plan

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 residential properties
- 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

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 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



Michael Woodland BTP MPIA
Director

Attachments:

- Attachment A: Response to issues raised by DPE
- Attachment B: Response to Submissions
- Attachment C: Revised SEPP and Signage Guidelines assessment
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- Attachment E: Revised Landscape Plans
- Attachment F: Revised Lighting Impact Assessment
- Attachment G: Revised Traffic Safety Assessment
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- Attachment K: Revised Survey Plan

Attachment A

Response to issues raised by DPE

Ref.	Issues raised	Response
<i>The Department requests the following:</i>		
1	<i>reduce the height and dimensions of the pylon sign to minimise visual and amenity impacts and prominence in the skyline, noting Inner West Council's DCP controls for pylon signs suggest a maximum height of 6 m</i>	<p>In response to DPEs request, design amendments have been made to reduce the overall height and depth of the sign. Updated architectural plans have been provided at Attachment D to demonstrate these amendments.</p> <p>The height of the sign has been reduced by 258mm to total 7.8m and the width has been reduced by 900mm to total 450mm. The substantial reduction in the height and depth of the signage will assist in minimising potential visual and amenity impacts.</p> <p>The proposed height of the sign is consistent with the height of surrounding buildings and will therefore sit comfortable within the streetscape. This also ensures the sign does protrude above or dominate the skyline.</p> <p>It is noted the Inner West DCP suggests a 6m maximum height for pylon signs. The Applicant has explored this and concludes a 6m height is not suitable for the following reasons:</p> <ul style="list-style-type: none"> • a further reduction in the signage height may create safety concerns given the proximity between the fence, signage structure and railway corridor which may result in climbing on the structure • a further reduction in height would also increase the likelihood of vandalism or graffiti on the signage structure, given a 6m height would mean the bottom of the structure may be within reach of pedestrians. • the proposed height of the sign allows sufficient room for vegetation and plants to provide screening, without the need for regular maintenance
2	<i>provide a landscaped treatment to the rear of the sign</i>	<p>Landscape Plans have been prepared by Scape Design and provided at Attachment E. Further, the following statement has been prepared by the Landscape Architect to provide detail of the tree plantings.</p> <p><i>The landscape design aims to improve landscape quality to Sydney Trains land as well</i></p>

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		<p>as visual quality to the public domain around the location of a new LED signage structure to be installed at the corner of Grosvenor Street and the Hume Highway in Ashfield.</p> <p>This will be achieved by removing existing weed infestations and poor-quality plants, cultivation and improvement of soils, jute lining and stabilisation, replanting and mulching of an existing slope likely to be impacted by or immediately surrounding the proposal. A plant species mix comprising native plants that are suited to local climatic and environmental conditions has been selected for replanting of the site. This will comprise mainly low spreading plants to assist with slope coverage and soil containment, as well as mass planting to create a visual barrier of the rail tracks from the road and properties above. We have estimated a height of 3m will provide visual mitigation of the rail tracks whilst not impeding views of the sign. The planting of taller shrubs or small trees was considered however this was deemed to have the potential to block views of the sign, as well as create a potential maintenance hazard due to the close proximity of the railway tracks below.</p>
3	<p>provide streetscape elevations (including any existing tree canopy, street lighting and the like) illustrating the visual impact of the amended sign from Grosvenor Crescent, Elizabeth Street and Hume Highway</p>	<p>Streetscape plans have been prepared and provide at Attachment K.</p> <p>The plans detail the surrounding built form and environment, in accordance with DPEs request.</p> <p>The plans demonstrate the proposed sign sits appropriately within its surrounding context and will result in minimal adverse visual impacts.</p>
4	<p>update the Visual Impact Assessment to include perspectives of the proposed sign from the following vantage points indicated on the map in red in Attachment A</p>	<p>A revised Visual Impact Assessment has been included to reflect the requested locations and changes to the signage design (Attachment I).</p>
5	<p>confirm the site is suitable for the proposed use with respect to contaminated land</p>	<p>A Structural Feasibility Statement has been prepared by Dennis Bunt Consulting Engineers (Attachment H); the statement concludes that the signage structure can be suitably installed.</p> <p>A Preliminary Geotechnical Assessment has been prepared by Douglas Partners and provided at Attachment J. The report also discusses the potential footing system operations. It is noted that the report recommends that further investigations can be undertaken post approval of this DA, subject to suitable conditions of consent.</p> <p>With regard to contaminated land, it is noted that no change to the existing use of the site is proposed. Notwithstanding, the sign is capable</p>

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		of being installed at the site as detailed within the above reports.
6	<i>provide an updated assessment of Chapter 3, Schedule 5 of State Environmental Planning Policy (Industry and Employment) 2021 and the Transport Corridor Outdoor Advertising and Signage Guidelines addressing the revised design</i>	An updated assessment against the Industry and Employment SEPP and the Guidelines is provided at Attachment C.
7	<i>provide additional information demonstrating how revenue is linked to improvements in local community services and facilities.</i>	A Public Benefit Statement has been provided to accompany the SEE and DA. The statement confirms that all revenue from the advertisements will be re-invested into the operation of the Sydney Trains network. This includes, but is not limited to, providing clean, frequent, and reliable services within the local community.

Attachment B


Response to Submissions

Ref.	Issues raised	Response
Inner West Council		
1	Underlying Objectives	
	<p>The SEE claims that the proposal is consistent with the Objectives of the Environmental Planning & Assessment Act, 1979 (EP&A Act 1979). It is considered that the objectives of the EP&A Act 1979 are not satisfied for the following reasons:</p> <ul style="list-style-type: none"> The sign is not considered to promote good design within an area established by local character; and The sign is not considered to promote good amenity for existing local residents and future residents in close proximity. 	<p>An assessment against the objectives of the EP&A Act was provided within the SEE. The proposal is consistent with the objectives of the EP&A Act as detailed below:</p> <ul style="list-style-type: none"> the proposed signage, as amended, is consistent with the setting and character of the locality, within a busy commercial corridor characterised by existing signage the proposed landscaping and new fencing will provide an improved public domain outcome the sign represents a contemporary form of digital advertising signage designed by Tzannes that is considered and creative ensuring a high-quality design outcome the amended LIA assessment (Appendix F) finds the signage to comply with the relevant requirements. In complying with the requirements, the proposed signage will not result in unacceptable glare nor should it adversely impact the safety of pedestrians, residents or vehicular traffic. Additionally, the proposed signage should not cause any reduction in visual amenity to nearby residences or accommodation. <p>Based on the above, it is considered the proposal satisfies the objects of the EP& A Act.</p>

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2	Permissibility & Zone Objectives	
	<p>The location of the sign is within SP2 – Rail Infrastructures Land, under the Inner West Local Environmental Plan 2022 (IWLEP 2022), and the SEE quotes the sign is permissible within this zone by virtue of it being ‘ordinarily incidental or ancillary’ to the railway. Council disagrees with this position for the following reasons:</p> <ul style="list-style-type: none"> • The sign is not identified to provide any function that would be considered ordinary incidental or ancillary to the railway; • The sign extends above the railway line; • The plans indicate the sign would be predominantly viewed from the surrounding street network; • The sign is not wholly for railway usage; and • The sign is for 24-hour use, noting that this is outside hours that the railway line operates. 	<p>Regardless of permissibility under the IWLEP 2022, the proposed sign is permissible with consent under clause 3.14 of <i>State Environmental Planning Policy (Industry and Employment)</i> (Industry and Employment SEPP) as it is on behalf of Sydney Trains and is within a railway corridor.</p> <p>Further, under clause 3.10(c) of Industry and Employment SEPP, the Minister is the consent authority for the application as it is for an advertisement displayed on behalf of Sydney Trains in a rail corridor.</p>
	<p>As such, the signage is only permissible by way of Clause 3.14 of the SEPP (Industry and Employment) 2021. It is however disagreed with the conclusion drawn in the SEE that the sign is consistent with the Transport Corridor Advertising and Signage Guidelines which in relation to Land Use require the following: i. The use of outdoor advertising in a given locality should not be inconsistent with the land use objectives for the area outlined in the relevant LEP. The objectives for the SP2 – Rail Infrastructures Land, IWLEP 2022, read:</p> <ul style="list-style-type: none"> • To provide for infrastructure and related uses. • To prevent development that is not compatible with or that may detract from the provision of infrastructure. • To protect and provide for land used for community purposes. • To provide for public, community and social infrastructure. It is considered that the sign is inconsistent with the above land use objectives. <p>As a result, the Minister should not grant consent to the sign</p>	<p>In accordance with subclause 3.14(1)(a) of Industry and Employment SEPP, the proposal is permissible with development consent as the application is for the display of a digital advertisement sign on behalf of Sydney Trains on a rail corridor.</p> <p>The proposal is considered to be consistent with the land use objectives for the SP2 infrastructure zone as follows:</p> <ul style="list-style-type: none"> • the proposal provides infrastructure related to the railway corridor. As addressed in the Public Benefit Statement accompanying the DA, the proposed sign will generate revenue to maintain and improve Sydney Trains’ infrastructure. • the proposal is sought on behalf of Sydney Trains, who will ensure no structure is approved to be erected that is not compatible or will detract from on the ongoing operation of the Sydney Trains rail network • the rail corridor is not considered ‘land for community purposes’ unless they are using the platforms or travelling within the train carriages. As such, the proposed sign will not have any impact on the land for community purposes.

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		<ul style="list-style-type: none"> As such, it is considered the sign is consistent with the land use objectives of the SP2 – rail infrastructure zone.
3	Signage Assessment	
	<p>As indicated in the SEE, the proposal indicates that it satisfies the requirements of Chapter A: Part 10 of the Inner West Comprehensive Development Control Plan 2016, along with the objectives of Schedule 5 of the SEPP (Industry and Employment) 2021.</p> <p>It is disagreed with the conclusions drawn in the SEE and it is considered that the sign does not satisfy the relevant objectives and controls for key following reasons:</p> <ul style="list-style-type: none"> The sign will not achieve a high level of design quality, is not compatible with the character of the streetscape and the desired future character of the locality The sign is of a scale, proportion and form that is inappropriate for the streetscape and its broader setting, as it will dominate the skyline when viewing the eastern vista from Elizabeth Street across the bridge. The sign will cause amenity loss and will have a detrimental effect on the built environment and appearance of a public area. The sign emits illumination that would result in unacceptable glare and is not subject to a curfew. This would result in a loss of amenity to surrounding residential properties, particularly to properties along Grosvenor Crescent and Liverpool Road The location and design of the sign is not consistent with road safety principles, as it would reduce the safety of the Hume Highway, Liverpool Road, Grosvenor Crescent and Elizabeth Street for pedestrians and vehicles. The sign is inconsistent with the theme for outdoor advertising in the locality. The proposal has not demonstrated that advertising will not result in visual clutter or other visual impacts upon the locality. 	<p>As noted, the proposed sign has been revised to reduce the overall visual bulk, clutter and impact on the views along the Hume Highway, Grosvenor Crescent and Carlton Crescent.</p> <p>The design amendments are considered to adequately address the assessment criteria outlined in <i>Schedule 5 of the SEPP (Industry and Employment) 2021</i> for the following reasons:</p> <ul style="list-style-type: none"> the proposed signage, as amended, is consistent with the setting and character of the locality, within a busy commercial corridor characterised by existing signage the sign represents a contemporary form of digital advertising signage designed by Tzannes that is considered and creative ensuring a high-quality design outcome the height and depth of the sign has been reduced to minimise any potential view impacts. the revised design will not cause any amenity loss, being oriented towards the Hume Highway, which is a busy transport corridor given the surrounding locality and context, being a busy road and rail corridor, with the existing presence of signage, it is considered the sign will not have a detrimental impact on the built environment and public area the proposed landscaping and new fencing will provide an improved public domain outcome the LIA finds the sign will comply with all relevant luminance requirements. Thereby, the sign will not result in unacceptable glare nor should it adversely impact residents, pedestrians or motorists. the location of the sign has been carefully selected with regard to cumulative impacts on pedestrians, motorists and general traffic

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	<ul style="list-style-type: none"> The sign does not show innovation or imagination in its relationship to the site. The applicant has not demonstrated a justifiable need for the signage or the merits that are associated with the proposal. <p>As a result, the proposal is not considered to satisfy the following objectives and controls under the Inner West Comprehensive Development Control Plan 2016 and SEPP (Industry and Employment) 2021;</p>	<p>safety. The TIA finds the signs location is suitable and will not compromise the safety of road users</p> <ul style="list-style-type: none"> TfNSW has reviewed the application and provided concurrence under section 138 of the Roads Act 1993 the proposal involves the removal of 2 advertising signs which ensures there will be no visual clutter within the vicinity the sign has been revised to better respond to its context, this includes revisiting the size and height and inclusion of additional landscaping to soften its setting within the surrounding area. <p>For the reasons demonstrated above, it is considered the proposed sign is consistent with the assessment criteria outlined in Schedule 5 of the Industry and Employment SEPP.</p>
4	SEPP (Industry and Employment) 2021	
	<p>In light of the above comments, it is considered that the proposal generally does not satisfy the following requirements of Schedule 5 – Assessment criteria under the Industry and Employment SEPP</p>	<p>As addressed above, it is considered the proposed signage and associated design amendments adequately satisfy the objectives and controls of the <i>SEPP (Industry and Employment) 2021</i>.</p>
	<p><i>Transport Corridor Advertising and Signage Guidelines 2017</i></p> <p>As indicated within the SEE, the submitted assessment of the proposal indicates that the proposal satisfies the requirements of the Transport Corridor Advertising and Signage Guidelines 2017. Council disagrees with the assessment that the proposal satisfies Part 3 of the Transport Corridor Advertising and Signage Guidelines, which state the following:</p> <p>3.3.1.3 Proximity to Decision Making Points and Conflict Points</p> <p>(a) A sign should not be located:</p> <p>(i) Less than the safe sight distance from an intersection, merge points, exit ramp, traffic control signal or sharp curves</p> <p>The SEE states that the safe stopping sight distance (SSD) from the intersection is 64 metres, with an operating speed of 60 km/h has</p>	<p>As identified within the Traffic Impact Assessment prepared by TTPP and figure below, the proposed sign is located beyond the minimum safe stopping distance (64m). The proposed advertisement would be visible to traffic on the Hume Highway travelling north-east.</p> <p>Therefore, the digital sign would not be located within the SSD of the stop line at the Hume Highway south-west approach. Therefore, the digital sign would not be located within the SSD of the stop line at the Hume Highway - Elizabeth Street - Grosvenor Crescent intersection, as shown in the figure below.</p> <p>TfNSW has reviewed the application and provided concurrence under section 138 of the Roads Act 1993</p>

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	<p>been used to calculate the safe stopping sight distance. However, insufficient information has been provided to demonstrate how the signage is located within the safe stopping sight distance. The architectural plans demonstrate that the proposed signage is within 64 metres of the safe stopping sight distance at the Hume Highway-Elizabeth Street-Grosvenor Crescent intersection.</p> <p>The SEE states that the signage complies with the required SSD, and that the 15 second dwell time will address this consideration. Council disagrees with this assessment; however further details are provided under the “Traffic/Pedestrian Safety” heading below on page 5.</p>	 <p>Figure 1: Safe Stopping Distance (Source: TTPP)</p>
	<p>As previously discussed above in relation to the permissibility of the proposal, insufficient information has been provided within the SEE to confirm whether the proposed signage will be an advertisement by or on behalf of Sydney Trains. On that basis, Clause 3.14(3) has not been satisfied and therefore the Minister must not grant consent to the application.</p> <p>With consideration of the matters that are addressed above, the proposal has not demonstrated that it is suitable for the subject site.</p>	<p>As identified within the SEE, the proposed sign is permissible with consent under clause 3.14 of the Industry and Employment SEPP as it is on behalf of Sydney Trains and is within a railway corridor.</p> <p>Further, under clause 3.14(3) of the Industry and Employment SEPP, the Minister is the consent authority for the application as it is for an advertisement displayed on behalf of Sydney Trains in a rail corridor.</p>
5	<p>Visual Impact upon residential properties</p>	
	<p>Insufficient documentation has been provided with the application to confirm the impacts to the surrounding residential properties, particularly to the nearest residential properties along Grosvenor Crescent, Liverpool Road and Carlton Crescent. The signage is approximately 50 metres away from the nearest residential property to the north-east at 88 Liverpool Road, 80 metres away from residential properties along Carlton Crescent which do not appear to have been</p>	<p>The LIA has been amended to include an assessment against the additional surrounding residential properties to the east of the proposed sign.</p> <p>The LIA notes the signs do not emit light backwards. Therefore, the residential properties to the east/rear of the sign will receive no illuminance</p>

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	considered within the assessment and is orientated in a manner where nuisance (such as glare and light spillage) may be caused to these properties. As illumination is proposed 24 hours a day, adverse impacts will be presented upon the residential amenity for properties along Grosvenor Crescent, Liverpool Road and Carlton Crescent from on-going glare and light spill caused by the proposal.	during the night-time operation and will have no impact on the amenity of the residents.
	A streetscape elevation plan has not been provided with the application to confirm the visual impact of the proposal upon the nearest residential properties. Given the scale of the proposal, the information provided does not enable confirmation as to whether the scale of the proposal is of an acceptable visual impact upon residential properties that are situated along Grosvenor Crescent, Liverpool Road and Carlton Crescent.	<p>An elevation plan has been prepared by Dennis Bunt Consulting Engineers and included at Appendix K.</p> <p>The plans demonstrate the proposed sign (as amended) appropriately respond to the character of the immediate context and will not result in unacceptable impacts from a visual perspective.</p> <p>The height of the sign is consistent with surrounding buildings and will therefore sit comfortable within the streetscape. This also ensures the sign does protrude above or dominate the skyline.</p>
6	Visual Impact Assessment	
	<p>Council's assessment of the Visual Impact Assessment (VIA) has identified the following issues with the submitted documentation:</p> <ul style="list-style-type: none"> • The assessment fails to consider all vantage points that are relevant, including viewpoints from residential properties along Carlton Crescent that are not obscured by vegetation. Reference is also made to certain vantage points that have been considered, however does not provide any further details which demonstrate this. This includes views from the West Ashfield Leagues Club referred to in Figure 8. • The VIA states that a maximum luminance of 200 cd/m² during the night-time period will be applied. However, no further details (such as elevation plans) have been submitted to provide an understanding of the sign's luminance during this period. • Figure 16 within the VIA demonstrates that the signage will present an unacceptable visual impact upon the mixed-use 	<p>An updated VIA has been prepared and provided at Appendix I. The VIA responds to Council's comments and concludes:</p> <ul style="list-style-type: none"> • viewpoints towards the sign from residential properties along Carlton Crescent are limited. The railway corridor, opposing these properties is heavily vegetated and restricts views towards the sign. Further, some of the residential properties have large retaining walls and/or vegetation which minimises direct viewpoints. There are no properties that have an uninterrupted view towards the sign. • the VIA refers to the LIA prepared by Electrolight which provides a detailed assessment of the lighting impacts on the nearby residential properties. the amended LIA assessment (Appendix F) finds the signage to comply with the relevant requirements. In complying with the requirements, the proposed signage will not result in unacceptable glare nor should it adversely impact the safety of pedestrians, residents or vehicular traffic. Additionally, the proposed signage should

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	<p>development that has been approved by Council at 88 Liverpool Road.</p> <ul style="list-style-type: none"> The viewpoints selected for the visual catchment have not been satisfactorily justified and do not appear to address the most significantly impacted viewpoints. For example, Figure 18 demonstrates that the viewpoint is significantly setback from the signage when viewed from Liverpool Road. A more appropriate viewpoint in this situation would have been from directly outside the boarding house at 83 Liverpool Road. 	<p>not cause any reduction in visual amenity to nearby residences or accommodation.</p> <ul style="list-style-type: none"> the VIA has been updated to reflect the revised sign design and potential impacts on the recently constructed mixed use development at 88 Liverpool Road. the VIA has been updated to reflect viewpoints from 83 Liverpool Road. The VIA concludes that viewpoints towards the sign from this property are limited due to the orientation of the signage towards the south-west, so no advertising material can be viewed and dense existing vegetation along the railway corridor, and future vegetation to be planted as part of this DA.
7	Traffic/Pedestrian Safety	
	<p>It is noted that the SEE contains conflicting information to demonstrate how the proposal satisfies road safety requirements under SEPP Industry and Employment or the Transport Corridor Advertising and Signage Guidelines 2017. The SEE states that the sign would not display colours and shapes which could be mistaken for a traffic signal or would not contain interactive technology or technology that enables opt-in direction communication with motorists, yet states that “the digital sign will provide visual interest to motorist along Hume Highway” and it is yet to be demonstrated how the proposed signage satisfies the relevant road safety principles, and objectives of the applicable environmental planning policies.</p>	<p>The specific detail of each advertisement is not yet known. However, no advertisement would be approved by JCDecaux to be displayed if it could be mistaken for a traffic signal or direction, or if it would contravene the relevant standards of <i>Transport Corridor Advertising and Signage Guidelines 2017</i>.</p> <p>It is further noted that standard conditions of consent will be imposed requiring that the advertisements displayed must not be capable of being mistaken:</p> <ul style="list-style-type: none"> (a) for a prescribed traffic control device; or (b) as text providing driving instructions to drivers. <p>The LIA finds the illumination of the signage will not result in adverse safety impacts on pedestrians and vehicles within proximity to the sign.</p>
	<p>The justification within the SEE regarding the acceptability of the proposal being within the safe stopping sight distance of the Hume Highway and Elizabeth Street intersection is disagreed with, for the reasons previously discussed above.</p>	<p>As identified within Figure 1, the proposed sign is not located within the safe stopping distance. Therefore, justification in this regard is not required as the proposed signage location is acceptable.</p> <p>Furthermore, TfNSW has reviewed the application and provides concurrence under section 138 of the <i>Roads Act 1993</i>.</p>

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	<p>The illumination of the signage will adversely affect the safety of pedestrians and vehicles, especially since the sign is proposed within the safe stopping sight distance that is applicable to the intersection.</p>	<p>As addressed above and detailed within the TIA, the sign will not be located within the safe stopping distance of the Hume Hwy and Elizabeth St intersection.</p> <p>Further, the LIA finds the proposed illumination is acceptable as it is well below with the AS4282 standards. In complying with the above requirements, the proposed signage should not result in unacceptable glare, nor should it adversely impact the safety of pedestrians, residents, or vehicular traffic.</p>
8	Impacts upon the Public Domain	
	<p>The proposed sign is in a visually prominent public location. This type of signage is not in keeping with the character and scale of the neighbourhood. Liverpool Road/Hume Highway is a classified road that adjoins residential streets and forms the southern end of the Ashfield town centre.</p>	<p>The design amendments to the original proposal have reduced the overall bulk and scale of the sign and minimised potential impacts on nearby residential properties.</p> <p>The proposal is appropriate for its setting, as it is located within a road and railway corridor in a highly urbanised area supporting and adding visual interest. The proposed sign does not compromise any important views or vistas.</p> <p>As set out above, the proposed signage is simple and contemporary which is an appropriate response to the character of the area.</p> <p>Furthermore, the proposal includes the removal of two existing static signs with an area of 8.4m² per sign. The proposal therefore rationalises signage within the area and mitigates visual clutter.</p>
	<p>Existing advertising is already causing significant visual clutter in the public domain that detracts from the overall experience of the streetscape in that area. An additional sign will diminish the visual quality of the public domain and the experience of Ashfield as a place</p>	<p>As identified within the Architectural Plans (Attachment D), the proposal seeks to remove 2 of the existing static signs located on the Hume Highway.</p> <p>The removal of these signs ensures the proposed sign does not contribute to any visual clutter and will not diminish the visual quality of the area.</p>
	<p>A comprehensive signage strategy is currently being prepared for the Inner West. This type of signage is incompatible with the proposed</p>	<p>At the time of lodgement and preparing this response, there is no public record of a draft signage strategy being prepared by the Inner West</p>

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	style and scale of signage that is likely to be rolled out across the LGA. This is considered likely to result in adverse impacts to the sense of consistency that the signage would achieve within the public domain, as well as disrupt the hierarchy of places and streets.	Council. Given, this strategy is preliminary in nature, it is not possible to provide consideration. Notwithstanding, as discussed above, the sign represents a contemporary form of digital advertising signage designed by Tzannes that is considered and creative ensuring a high-quality design outcome.
	Visual connection within streetscapes/the public domain improves the pedestrian experience, passive surveillance, and safety, and contributes to a sense of place identity. The intersection of Liverpool Road and Grosvenor Crescent/Elizabeth Street is a key arrival moment for pedestrians and drivers travelling in all directions. The proposed sign would be a visual focal point that detracts from the existing view lines in each direction, which are integral to the quality and experience of people travelling through this area.	<p>As noted, the proposed sign has been revised to reduce its overall bulk and scale, to minimise clutter, and mitigate impact on the views along the Hume Hwy and pedestrian pathways. The proposed sign is considered compatible with the surrounding environment and will not adversely impact the public domain.</p> <p>It is noted that proposal includes landscaping and new fencing will provide an improved public domain outcome.</p>
	There are already significant issues around pedestrian and vehicle conflict along Liverpool Road, Ashfield. Available crash data shows that there is a higher volume of pedestrian and vehicles crashes than other local places. Any source of distraction to drivers would decrease pedestrian safety.	<p>Historic crash data across a five-year period was reviewed and assessed as part of TIA submitted with the DA. Further to this, the Traffic Consultants, TTPP note:</p> <p><i>A total of 11 crashes were recorded within the visible distance of the proposed sign location. These crashes were located at intersections, generally involving cross traffic, rear-end and right-near related crashes. Of note, these types of crashes are not unusual as a result of typical turning movements at intersections, particularly at signalised intersections. It is however noted that no pedestrian related crashes were reported within the visible distance of the sign location along Hume Highway.</i></p> <p><i>The proposed sign would not be located within the safe stopping distance to traffic signals, crossings, directional/information signage or any other decision point.</i></p> <p><i>Therefore, TTPP is of the view that the proposed sign would not decrease pedestrian safety, nor compromise on road safety for all users at this location.</i></p>

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		It is noted that TfNSW has reviewed the application and provides concurrence under section 138 of the Roads Act 1993.
	Given the above, the signage would impact negatively on the look and feel of the public domain and would detract from the positive elements that contribute to the identity of Ashfield, as well as negatively impacting pedestrian and vehicle safety.	<p>As set out above, the proposed signage is simple and contemporary which is an appropriate response to the character of the area and will allow the significant elements such as residential properties and open space to remain visually dominant.</p> <p>The proposed is considered appropriate for its setting, as it is located within a road and railway corridor, in a highly urbanised area, supporting and contributing to visual interest.</p> <p>Further, the TIA prepared by TTPP finds the proposed signage will not have any adverse impacts on pedestrian or vehicular safety.</p>
	Public Benefit & Interest	
	As indicated above, one aim/objectives of the Industry and Employment SEPP and a matter for consideration is how the public benefits from the proposal, with the aim being:	As detailed above, and in the Public Benefit Statement provided in the DA, all revenue associated with the proposal will be re-invested into the Sydney Trains network, ensuring the delivery of a range of public benefits.
	<i>e) to ensure that public benefits may be derived from advertising in and adjacent to transport corridors.</i>	The public benefits will be associated with the Sydney Trains network. Furthermore, along the railway corridor the DA seeks to:
	The SEE claims that the revenue generated by the sign will help fund essential Sydney Trains services. The SEE does not provide any framework and/or mechanism to support this claim, in terms of demonstrating a direct link from the revenue received. This would appear to be a fundamental requirement in terms of ensuring probity to the revenue received and the public benefit claim.	<ul style="list-style-type: none"> remove the static signage located on the railway bridge, consolidating, and thereby reducing the amount of signage along the corridor. provide additional landscaping together with new fencing along the railway corridor, resulting in an improved streetscape outcome.
	It is considered that any revenue stream could assist with all of the above perceived benefits and there is no direct public benefit to how this sign will be benefit to the local area. Furthermore, the above matters relate to benefits to train commuters upon which the signage is facing away and is directed to the road network users.	

Ref.	Issues raised	Response
	<p>The SEE also does not provide any information to the amount of time given to 'emergency messaging and announcements' to support part of the public benefit claim. The lack of information in relation to this, provides a low level of certainty in that this could form part of any perceived public benefit.</p>	<p>The Public Benefit Statement accompanying the DA states:</p> <p><i>This public benefit for Sydney Trains, TfNSW and emergency services to access digital screens to provide instantaneous messaging to Sydney Trains users is a significant component of the digital program to provide a benefit to the public in certain locations around Sydney. In addition, Sydney Trains may also access the digital screens for up to 5 minutes per hour for Sydney Trains and TfNSW customer promotions and events at no cost.</i></p> <p>As noted above, emergency messaging and announcements will be provided as required by these services. To ensure certainty, the Applicant is willing to accept the above as a condition of consent.</p>
	<p>Notwithstanding, the matters listed do not entail a public benefit to the wider community as recommended by the Transport Corridor Outdoor Advertising and Signage Guidelines. It is recommended that Sydney Trains considers alternatives to acquiring the required revenue and also a proposal which does not result in such a detrimental impact to a local area.</p>	<p>In relation to Sydney Trains advertising, the Guidelines define an appropriate public benefit as follows:</p> <p><i>4.2.1 RMS and TfNSW, Sydney Trains and NSW Trains advertising For TfNSW, Sydney Trains and NSW Trains, railway station upgrades (e.g. providing wheelchair access) and rail crossings (e.g. installation of lights or gates) or other rail safety measures may be considered priority works. Amenity improvements along rail corridors including landscaping, litter removal, or vandalism and graffiti management may also be considered appropriate public benefits.</i></p> <p>As addressed within the SEE and Public Benefit Statement, the installation of the proposed sign will continue to provide a valuable revenue stream to Sydney Trains which will continued to be used to support a number of improvements and maintenance programs.</p> <p>Furthermore, the proposal removes existing low-quality signage and will provide additional landscaping and new fencing along the railway corridor, resulting in an improved streetscape outcome.</p>

Ref.	Issues raised	Response
		Based on the above, it is considered the public benefit demonstrates consistency with the public benefit test provisions identified in Industry and Employment SEPP and the Guidelines.
	Should the Minister be of the opinion to approve this application, a real public benefit to the wider community should be provided; i.e., availability of signage to community groups and Council, a maintenance program for the bridge including regular graffiti removal, painting, landscaping to improve the aesthetics of the bridge & immediate surrounds, monetary contributions for upgrades to the area. These measures are considered to have a public benefit as opposed to those identified in the application.	As addressed above, a series of public benefits will be provided as part of this DA. Based on this, the benefits to the public as a result of the proposed sign are considerable.
	Conclusion	
	<p>As outlined above, it is considered that the proposed signage does not satisfy relevant planning objectives and controls, is not consistent with the desired future character of the area and there is no public benefit associated with the signage.</p> <p>It is also considered that the documents submitted do not adequately represent the proposal and do not accurately provide a comprehensive representation of the full impacts of the proposal. As a result, it is considered that the sign should be refused.</p> <p>We would invite the applicant and the DPIE Team to meet with Council to discuss this proposal and future proposals that may be considered.</p>	For the reasons demonstrated above, it is considered the proposed signage and associated design amendments adequately satisfy the relevant planning objectives and controls. The proposed sign is simple, contemporary and represents a high-quality design. The public benefits demonstrates consistency with the public benefit test provisions identified in Industry and Employment SEPP and the Guidelines.
Transport for NSW		
1	TfNSW has reviewed the submitted application and provides concurrence under section 138 of the Roads Act 1993 subject to the following conditions being included in any approval issued by the Department.	Noted, the Applicant has reviewed the proposed conditions of consent provided by TfNSW and has no objections.

Ref.	Issues raised	Response
Public Submission		
1	<p><i>I strongly object to this proposed signage location and intended purpose of.</i></p> <p><i>Firstly.....It is of no use whatsoever to the general public as a street aid or street sign but just for advertisement purposes and money revenue gathering reasons and even more so it will be illuminated 24/7 which will make it a distraction to all drivers travelling east and west, and an bright eyesore to all the surrounding residents.</i></p> <p><i>Secondly.....this huge sign will obstruct and effect the view of the public to the 3x existing commercial shops, located directly behind it, which in turn, will disrupt and effect the potential value causing devaluation of the 3x commercial shops in question behind ,which now become a legal matter that gives potential cause for the property owners to take this applicant to court at their cost if they wish to continue with the proposed application at that location.</i></p>	<p>As addressed above, the LIA provides an illuminance assessment of nearby dwellings and calculation of the amount of illuminance (measured in Lux) that the properties are likely to receive from the signage during night time operation.</p> <p>The proposed signage has been found to comply with all relevant requirements of AS 4282-2019 <i>Control of the Obtrusive Effects of Outdoor Lighting</i>.</p> <p>In complying with the above requirements, the proposed signage should not result in unacceptable glare, nor should it adversely impact the safety of pedestrians, residents, visitors or vehicular traffic. Additionally, the proposed signage should not cause any reduction in visual amenity to the commercial shops at 121-123 Carlton Crescent.</p> <p>Further, an updated VIA has been prepared which provides an assessment against the potential impacts on the commercial shops located at 121-123 Carlton Crescent, Summer Hill. The VIA and accompanying photomontages confirm there will be no disruption to the commercial premises given the orientation of the sign, substantial separation distances and landscaping.</p>