

26 June 2023

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

Attention: Abigail Bautista, [Abigail.bautista@dpie.nsw.gov.au](mailto:Abigail.bautista@dpie.nsw.gov.au)

Dear Mr Thomas,

**Response to Request for Information (DA 22/14353)  
Digital Advertising Sign – Pacific Highway, Pymble**

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 12 May 2023 in relation to Development Application DA 22/14353.

A response to the issues raised in DPE's letter is detailed in the table at **Attachment A**.

This response is supported by amended Plans and Specialist Statements (**Attachments B-E**) which were prepared to directly respond to issues raised by DPE. The updated plans propose additional landscaping to further reduce any visual impacts on residential receivers. In addition, the sign is proposed to be completely turned off during the nighttime (11pm-6am), which will further mitigate any adverse lighting impacts.

This response reinforces the findings made within the SEE, that the proposed digital advertising sign:

- will not unreasonably impact the amenity of nearby areas in keeping with the provisions of the Industry and Employment SEPP (SEPP) and Guidelines
- will not result in unreasonable visual impacts on nearby residential receivers
- demonstrates compliance and meets the objectives of Ch 3 and Sch 5 of the SEPP
- will result in acceptable lighting, road safety and visual impacts
- will provide a public benefit to the community by generating revenue which supports essential Sydney Trains services
- will be structurally sound

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 (02) 8459 7508 or via email at [padraig@keylan.com.au](mailto: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:** Amended Structural Feasibility Statement
- Attachment C:** Design Statement
- Attachment D:** Amended Architectural Plans
- Attachment E:** Amended Landscape Plan

## Attachment A

### Response to issues raised by DPE

Ref.	Issues raised	Response
<b>1</b>	<b>Structural Feasibility Statement</b>	
	<i>Provide an updated Structural Feasibility Statement that confirms the site (including the retaining wall structure) can support the weight of the proposed signage, new landscaping and loading from equipment (including the use of a crane) used during the construction period.</i>	<p>An updated Structural Feasibility Statement has been prepared by Dennis Bunt Consulting Engineers (<b>Attachment B</b>).</p> <p>The statement confirms:</p> <ul style="list-style-type: none"> <li>the weight of the sign will be supported by the 4 piles onto the rock.</li> <li>the additional landscaping (outlined in <b>Attachment E</b>) will not add any significant load to the brick retaining wall</li> <li>the construction equipment, including the crane and drilling rigs, will be located on the Pacific Highway at night during a partial road closure and will not encroach on the soil. The excavation works will not add any significant load to the soil or the brick retaining wall</li> </ul>
<b>2</b>	<b>Visual impacts</b>	
	<i>The Visual Impact Assessment (VIA), dated November 2022, assesses the visual impact to the closest residential receiver (located at 2 Avon Street) from ground level at the corner of Avon and Everton Streets and relies on an existing tree to provide screening to the sign. However, the Arborist Report, dated 13 March 2023, identifies that this tree will need to be removed to accommodate the proposal. It is noted that there are numerous windows and balconies along the residential façade that address the sign and would have view of the display area.</i>	<p>A revised Landscape Plan has been provided at <b>Attachment E</b>.</p> <p>The selection of tree species has been carefully considered to provide substantial screening for the adjacent residential receivers, particularly the nearby residential flat building at 2 Avon Street.</p> <p>The revised landscaping scheme comprises the planting of 20 plants as described below:</p> <ul style="list-style-type: none"> <li>8 Prickly Paperbark <ul style="list-style-type: none"> <li>Height: 5m</li> <li>Spread: 4m</li> </ul> </li> <li>12 Bottlebrush <ul style="list-style-type: none"> <li>Height: 3m</li> <li>Spread: 3m</li> </ul> </li> </ul>

Ref.	Issues raised	Response
	<i>Provide an updated visual assessment of impacts to 2 Avon Street that considers the impact of the proposal to the residences and considering the tree removal proposed. It is noted that landscaping, in the form of appropriate trees or large shrubs, may be required to screen the proposal. Any landscaping proposed must be considered in the updated Structure Feasibility Statement, required in point 1 above, to ensure the retaining wall can accommodate the landscaping.</i>	<p>The trees have been positioned to create dense bush and appropriate screening to the adjacent residential receivers.</p> <p>The DA included a Lighting Impact Assessment (LIA) which specifically reviewed the luminance impacts on 2 Avon Street. The LIA concluded the sign was compliant with all relevant Australian Standards and resulted in acceptable impacts on residents.</p> <p>In addition to the above, only the side elevation of the sign will be visible from the residences at 2 Avon Street. The side of the sign consists of a black, solid material and does not include digital advertising.</p> <p>To further address DPE's comment and ensure impacts to 2 Avon Street are adequately mitigated, the Applicant has proposed to completely turn off the sign during the nighttime, between the hours of 11pm-6am.</p> <p>Given the above, it is considered the impacts to residential receivers, specifically 2 Avon Road are acceptable as:</p> <ul style="list-style-type: none"> <li>the proposed landscaping will reach heights of 5m and 4m respectively and are positioned to overlap and provide dense screening</li> <li>the sign will be completely shut down from 11pm – 6am</li> <li>the sign is orientated towards Pacific Highway and therefore only the side elevation, consisting of appropriate materials, is visible to the residences</li> </ul>
	<i>As shown in the architectural elevations, the top and sides of the signage will be in aluminium frame in solid colour black. To reduce visual prominence of the signage, a solid black colour for both sides and top should not be used. The use of similar perforated metal panels colour silver or stainless cladding as proposed in other parts of the signage (shown in the submitted architectural plans) would be preferable.</i>	<p>A Design Statement has been prepared by Tzannes Architects (<b>Attachment C</b>).</p> <p>The Statement confirms the proposed satin (semi-gloss) black powder coat finish is not a solid black colour and that the balance and composition of materials is appropriate to the urban context and reduces visual bulk. In comparison, a stainless-steel frame would appear visually busy, overly reflective and would result in a poor outcome.</p> <p>An extract of the statement is provided below (<b>bold</b> our emphasis):</p> <p><i>'It is important to note that the 0.45m wide display <b>frame is a satin (semi-gloss) black powder coat finish and not a flat 'solid black colour'</b>. The satin black powder coat finish</i></p>

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		<p>will reflect some of the ambient sky colour in the day while not being overly bright or reflective at night.</p> <p><b>The satin black display frame relates directly to the form of the stainless-steel cladding structure below and articulates the top of the signage structure, therefore diminishing the visual bulk.</b> The visual size of the signage structure would be overemphasised if it was a single brightly coloured finish/material.</p> <p>The satin black display border also frames the digital display and gives contrast against the urban backdrop, an example of this would be a traffic light that uses the black backing for contrast. <b>A perforated silver or stainless-steel display frame</b> does not lend itself to the front of the signage as <b>could appear visually 'busy', over reflective</b> or reveal the internal structure behind it, detracting from the overall design intent.'</p> <p>The <b>balance and composition of the currently proposed quality materials</b> and finishes aim to <b>contribute to the urban experience</b>.</p> <p>Given the above, it is considered the proposed signage materials is the most appropriate design outcome.</p>
	<p>The photomontages of the proposal and elevation plans submitted identify the sign at different heights when compared to the street light structures. Clarify whether the proposal will be the same height as the street lighting structures (as shown in the elevations) or below the street lighting structures (as shown in the photomontages) and confirm the heights of the nearby lighting structures. Provide updated documentation illustrating the correct height of the sign in relation to the lighting structures and confirmation whether any conclusions of the VIA need to be updated.</p>	<p>Updated Architectural Plans have been prepared by Dennis Bunt Consulting Engineers (<b>Attachment D</b>) to confirm the sign will be below the height of the street poles and ensure consistency with the remaining consultant documentation.</p> <p>Given this, an updated VIA is therefore not required to be updated as the structure will not be higher than structures surrounding it.</p>