

19 September 2023

Stuart Withington
Acting Director, Regional Assessments
NSW Department of Planning and Environment
Locked Bag 5022, Parramatta NSW 2124

Attention: Michael Doyle (michael.doyle@dpie.nsw.gov.au)

Dear Mr Withington,

**Response to Request for Information (DA 23/5550)
Digital Advertising Sign – Princes Highway, Heathcote**

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 31 July 2023 in relation to Development Application DA 23/5550

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 remove the originally proposed hardstand area and now include the installation of a baffle on the eastern side of the structure to further reduce any visual impacts on residential receivers. In addition, the sign is now 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 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:** Figures and Maps
- Attachment C:** Amended Architectural Plans
- Attachment D:** Amended Lighting Impact Assessment
- Attachment E:** Amended Traffic Safety Assessment
- Attachment F:** Amended Visual Impact Assessment

Attachment A

Response to issues raised by DPE

Ref.	Issues raised	Response
1	Statement of Environmental Effects	
	<ul style="list-style-type: none"> The Statement of Environmental Effects describes that there are three existing static advertising signs within proximity to the subject site. Provide an amended Statement that: <ul style="list-style-type: none"> Shows the locations of the signs on a single map Includes details of the approved size and any approved illumination arrangements, and copies of the existing consents and approved plans these signs, including the sign/s to be removed. 	<ul style="list-style-type: none"> A consolidated map outlining the three nearby signs is provided at Attachment B. An overview of the signs approximate details are provided below: <ul style="list-style-type: none"> Sign 1 is a single sided, static sign located to the south of the proposed sign. Sign 1 comprises an area of approximately 37.5m² (12.5m x 3m). Sign 2 is a double sided, static sign located approximately 105m to the north of the proposed sign. Sign 2 comprises an area of approximately 18m² (6m x 3m). Sign 2 is being removed as part of this DA. Sign 3 is a double sided, static sign located approximately 300m to the north of the proposed sign. Sign 3 comprises an area of approximately 18m² (6m x 3m). All 3 signs are illuminated by external lights i.e., floodlights.
2	Site Plan	
	<ul style="list-style-type: none"> The Site Plan identifies the construction of a large hard surface area behind the sign. The hard surface area appears to be unwarranted and unnecessary for general maintenance purposes, as well as contrary to the intention of the Guidelines which promote landscaping in conjunction with new signs in a transport corridor. Consider deletion of the proposed hard surface area in an amended set of plans 	<ul style="list-style-type: none"> Noted. The hardstand has been removed from the proposed works. A revised set of Architectural Plans has been prepared to reflect this (Attachment C)
	<ul style="list-style-type: none"> The location of the proposed sign on the aerial photo inset on the site plan appears to be inconsistent with the architectural drawing. Provide an amended, corrected plan. 	<ul style="list-style-type: none"> The Architectural Plans have been amended to accurately depict the location of the proposed sign in the site plan (Attachment C).
3	Signage Safety Assessment	
	<ul style="list-style-type: none"> The location of the sign in Signage Safety Assessment (e.g. Fig 2.1 and 5.1) appears to be incorrect. Provide an amended, 	<ul style="list-style-type: none"> The Signage Safety Assessment (SSA) has been amended to accurately depict the location of the proposed sign (Attachment E)

Ref.	Issues raised	Response
	<i>corrected report, including any adjustments to the safety assessment, if required.</i>	<ul style="list-style-type: none"> The amended figures do not change the assessment and conclusions provided within the SSA.
4	Visual Impact Assessment	
	<ul style="list-style-type: none"> <i>The Visual Impact Assessment (VIA) incorrectly shows the visual catchment of the sign and does not demonstrate the proposed view from surrounding premises. Provide an amended VIA, and provide a landscape management plan and amended details of the proposed illumination levels and operation of the sign if required, as follows:</i> <ul style="list-style-type: none"> <i>The area shaded in red in Figure 6 does not correspond to the location or the orientation</i> <i>of the proposed sign. Provide an amended VIA with a correct Figure 6 with:</i> <ul style="list-style-type: none"> <i>The exact location and orientation of the sign</i> <i>A catchment that includes all locations that potentially could view the sign, even at an oblique angle.</i> <i>The VIA does not demonstrate the proposed view from surrounding premises. Provide an amended VIA demonstrating existing and proposed views from the closest affected residential premises, including from:</i> <ul style="list-style-type: none"> <i>The north-western elevation of the residential premises at 1 Wilson Parade</i> <i>The eastern elevation of residential premises at 1317-1321 Princes Highway (if these premises are within the updated visual catchment in Figure 6, as required above)</i> <i>The dwelling at 1322 Princes Highway.</i> <i>Provide an amended VIA with an inset (such as those in Figures 2, 3, 4, 5, 9 and 11) which show the viewing location / angle for all images used to assess the visual impacts of the proposal. In this regard, Figures 12 and 16 require an inset, in addition to any views showing impacts from adjoining premises, requested above.</i> 	<ul style="list-style-type: none"> The Visual Impact Assessment (VIA) has been amended to reflect the comments raised by DPE. The amended VIA is provided at Attachment F The findings of the revised VIA remain consistent with the previous assessment, which concluded: <ul style="list-style-type: none"> the surrounding area has a low to high visual sensitivity due to the number of residential dwellings and existence of a heritage item the sign is consistent with the character of the surrounding area, which contains existing outdoor advertising the proposal will not contribute to visual clutter as it involves the removal of an existing double sided sign within the vicinity the proposed sign will be visible to a high number of motorists reflective of its location and proximity to the Princes Highway views to the proposed sign from sensitive receivers will be minimised by the proposed baffles, illumination curfew, existing street trees, fencing and signage furthermore, the location and orientation of the proposed sign has been carefully considered to limit the number of residential dwellings within the visual catchment, minimising potential impacts the proposal will not impact upon the fabric of nearby heritage items or views to these items the proposal will not impact any scenic views or protrude above the dominant skyline. Following consideration of the above, the proposal is considered to result in acceptable visual impacts to the Princes Highway, Heathcote and surrounding area.

Ref.	Issues raised	Response
	<ul style="list-style-type: none"> Based on the amended VIA, as necessary, consider mitigation for surrounding residential premises. Consideration may need to be given to landscape screening, curfews on illumination, and / or adjustments to illumination levels. Any ongoing maintenance arrangements should be detailed within a landscape management plan. <p>Please note that a timeframe of 12 months or more for landscaping to mature and establish effective screening of sign from surrounding residential premises will require additional assessment of visual impacts without the vegetation (from all equivalent perspectives).</p>	<ul style="list-style-type: none"> As addressed, additional mitigation measures, including the installation of a baffle on the eastern side of the structure and amended curfews on illumination are implemented. These additional measures will adequately minimise any potential adverse impacts Given the above, it is considered that additional landscaping is not be required.
	<ul style="list-style-type: none"> Based on the amended VIA, consider if the illumination and lighting impact assessment should be adjusted, noting the Guidelines provide that 'areas that have residential properties nearby' would usually be considered as being in Zone 4, and the 'consent authority may determine that a site is in a more sensitive zone if there is a sensitive land use (i.e. residential) nearby that may be affected. The Department considers it is likely that the illumination should be based on Zone 4, rather than Zone 3, but will review once the amended VIA is provided. 	<ul style="list-style-type: none"> A revised Lighting Impact Assessment has been amended (Attachment E) to reflect the illumination based on Zone 4. The revised LIA concludes the proposed signage complies with all relevant Australian Standard (4282-2019) requirements.
	<ul style="list-style-type: none"> The Response to Submissions (RTS) dated 26 July 2023 describes that the VIA concluded that the proposed sign will not directly face, will be sufficiently separated from and will not be directly viewed from the dwelling at 1 Wilson Parade. However, as above, the VIA incorrectly shows the visual catchment of the sign. An amended VIA is required and, subsequently, an amended Lighting Impact Assessment (LIA) and mitigation for surrounding residential premises may be required. In these circumstances, an amended RTS should also be made. The amended RTS must show new content in track changes and refer to the amended VIA, LIA and any other amended supporting documentation. 	<ul style="list-style-type: none"> As addressed, an amended VIA has been prepared. The sign will not directly face and is separated from the dwelling at 1 Wilson Parade. The amended LIA also concludes the proposed sign will comply with the relevant luminance levels and will not result in unacceptable glare or amenity impacts to nearby residences or accommodation. Additionally, baffles will be installed on the eastern side of the signage structure to minimise any potential view lines towards the signage. Given the above, an amended RtS is not considered necessary as the findings outlined remain consistent with the above.

Attachment B

Figures



Figure 1: Proposed and Nearby existing signage (Source: Nearmap)