

6<sup>th</sup> September 2023

J5413J

**City of Sydney**  
Town Hall House  
No. 456 Kent Street  
Sydney NSW 2000

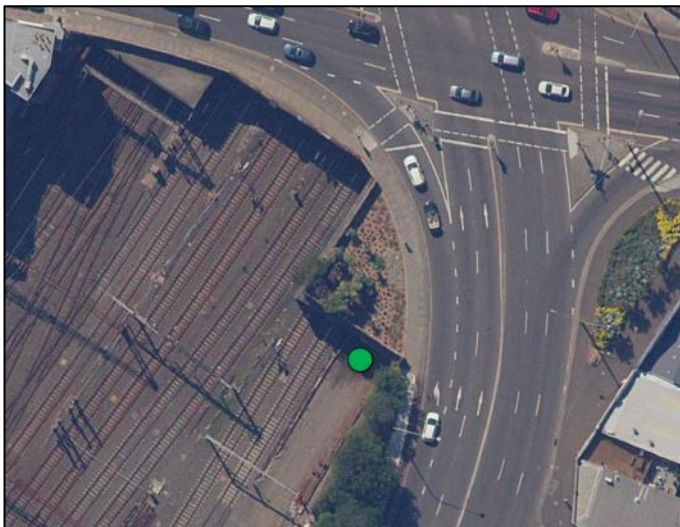
**Re: DA22/6816 | Cleveland Street and Regent Street, Surry Hills  
(Outbound)**

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This letter has been prepared at the request of JCDecaux in response to a number of issues raised by the City of Sydney in a letter relating to DA22/6816. The Development Application (DA) seeks consent for the installation of a new third-party digital advertising sign at the south-west corner of the intersection of Cleveland Street and Regent Street, Redfern. This letter should be read in conjunction with the Heritage Impact Statement prepared for the DA, dated February 2023, by Weir Phillips Heritage and Planning and other supporting documentation.

The site is located within the City of Sydney. The principal environmental planning instrument for the site is the *Sydney Local Environmental Plan 2012 (LEP 2012)*. The site is not listed as a heritage item but lies within the vicinity of items listed on the State Heritage Register under the *NSW Heritage Act 1977* being the 'Sydney Terminal and Central Railway Stations Group' and the 'Cathedral of the Annunciation of Our Lady,' noting that these items are also listed by Schedule 5 Part 1 of the *LEP 2012*, and the Central Railway Station is also listed on a s170 Register. The proposed sign also lies within the vicinity of items and a Heritage Conservation Area listed by Schedule 5 Parts 1 and 2 of the *LEP 2012*, being the 'Former Mercantile Banking Chambers including interiors' and the 'Redfern Heritage Conservation Area.'

The site of the proposed signage is located within an access track adjacent to the railway corridor and approximately 5m below the level of Regent Street. The site of the proposed sign is separated from the street by a painted brick wall with a metal safety barrier. Refer to Figures 1 and 2.



**Figure 1: Site location (indicated by the green circle).**  
SIX Maps, 2023.



**Figure 2: Looking towards the area of the proposed works from the intersection of Regent and Cleveland Streets. The green arrow indicates the approximate location of the proposed signage.**  
Provided by the client; annotation by WP Heritage and Planning.

This section responds to the issues raised by City of Sydney which are as follows:

### ***Heritage Impacts***

*The proposed sign is located adjacent to Redfern Estate Heritage Conservation Area (HCA) and is in the vicinity of several State and locally listed heritage items. These include State heritage item (SHI No. 01255) known as the Sydney Terminal and Central Railway Stations Group, State heritage item (SHI No. 01881) known as the Cathedral of the Annunciation of Our Lady, and local heritage item (No. I199) known as the Former Mercantile Bank Chambers.*

*The City objects to the proposed sign due to its adverse heritage impacts.*

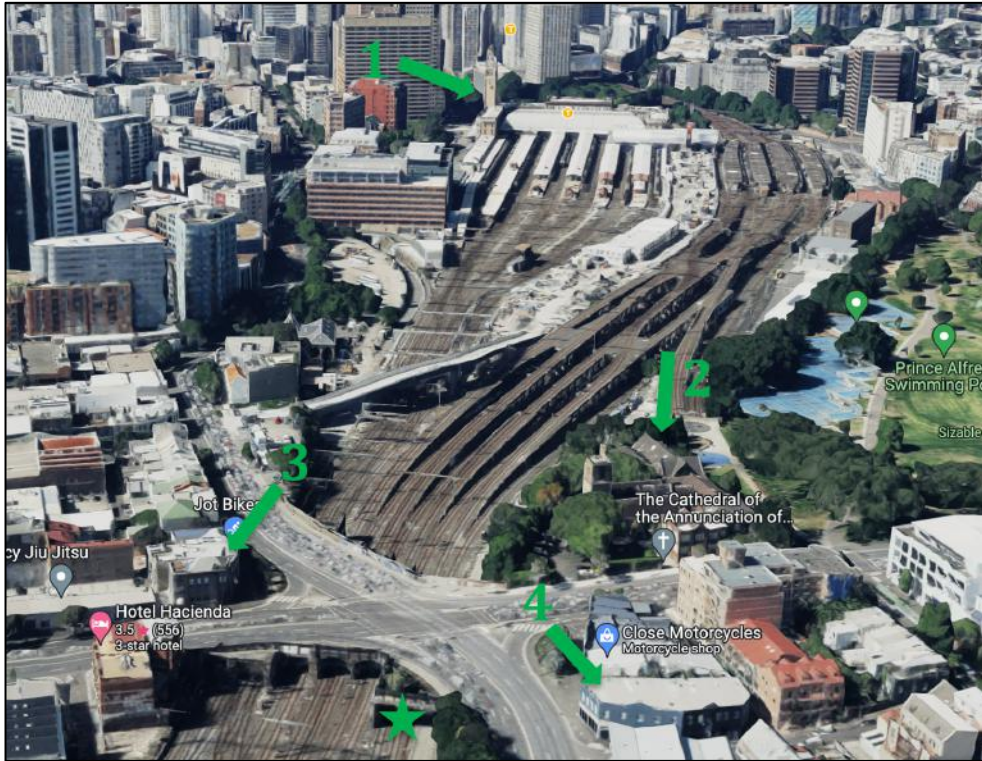
- The proposed signage location will be highly visible from the Redfern Estate HCA, as well as the three heritage items listed above. The views towards the proposed location from the HCA and the three heritage items currently includes a landscaped outlook due to the landscaped area in the foreground of the proposed sign and the tree canopies along Regent Street. Those views are adversely impacted by the signage and it does not enhance or improve the heritage items or views.*
- The proposed sign will be a visually detracting element in the immediate visual catchment and will have no relationship with the surrounding heritage context.*
- The proposed illuminated signage is not in keeping with this heritage context.*

### ***View Impacts***

- Section 5.1.8 of the Sydney Development Control Plan 2012 (Sydney DCP 2012) identifies the Central Station clock tower as a key view within, and helps define, Central Sydney. The Sydney DCP 2012 outlines that the clock tower represents a landmark particularly when approaching or departing Central Sydney, and how the clock tower was purposely composed at the alignment of several streets so as to maximise the visibility of the clock face.*
- The proposed sign may have adverse visual impacts by obstructing views to the clock tower. Further, it may compete with views to the Cathedral to the north of the north.*
- As such, the proposed signage is not consistent with the objectives of Section 5.1.8 of the Sydney DCP 2012 which seeks to preserve significant views and ensure the silhouette created by existing clock towers and roof features on heritage listed items are clearly visible against the sky.*

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Refer to Figure 3 which reproduces an oblique 3D view of the surrounding area. This photograph demonstrates the location of the proposed sign with respect to the Central Station clock tower, the Cathedral of the Annunciation of Our Lady (No. 242 Cleveland Street), the Former Mercantile Banking Chambers (No. 151 Regent Street) and the Redfern HCA.



**Figure 3: 3D map showing site (green star) and surrounding heritage items (indicated by the green arrows and numbered).**

Google Maps 2023

Key: 1 = 'Central Station clock tower'

2 = 'Cathedral of the Annunciation of Our Lady'

3 = 'Former Mercantile Bank Chambers including interior'

4 = 'Redfern HCA'

**The following responds to each of the issues raised above:**

- *The proposed signage location will be highly visible from the Redfern Estate HCA, as well as the three heritage items listed above. The views towards the proposed location from the HCA and the three heritage items currently includes a landscaped outlook due to the landscaped area in the foreground of the proposed sign and the tree canopies along Regent Street. Those views are adversely impacted by the signage and it does not enhance or improve the heritage items or views.*

It is acknowledged that the proposed signage will be visible from the Redfern HCA and from the three heritage items, notwithstanding, the extent to which it is visible differs for each. Figures 4 and 5 show the general view of the proposed signage on Cleveland Street and Regent Street in the vicinity of the nearest two heritage items being the Former Mercantile Banking Chambers and the Cathedral of the Annunciation of Our Lady, as well as the Redfern HCA.



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**Figure 4: Looking towards the site of the proposed signage from the north on Regent Street.**

Urbis 2023; annotations by WPH&P.



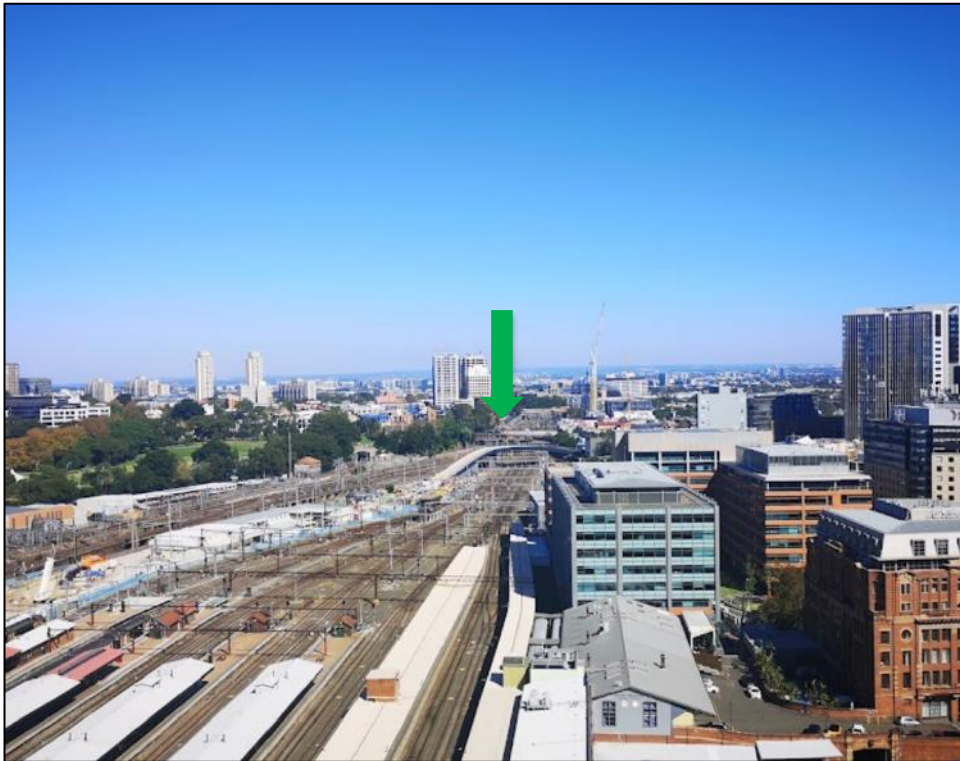
**Figure 5: Looking towards the site of the proposed signage from the east on Cleveland Street.**

Urbis 2023; annotations by WPH&P.

The view towards the proposed location is a busy streetscape of contemporary elements including infill development, traffic poles, advertising signage and road signs. This is partially softened by relatively recent planting in the foreground of the proposed sign and along Regent Street, being Council's 'landscaped outlook'.

Figure 4 demonstrates the principal view towards the Redfern HCA. The proposed signage is visible, however, it is against a backdrop of contemporary residential flat buildings. Contributory buildings which form the HCA have little to no visibility. Figure 5 demonstrates the view from the Redfern HCA towards the proposed signage which, in this instance, is only partly obliquely visible. We concur with the conclusion made by the updated Visual Impact Assessment that the signage will have no impact on the Redfern HCA. This is further supported by Figures 7 and 8 in the section below which shows other views to and from the Redfern HCA.

It is further disagreed that the proposed signage will be 'highly visible' from the Central Station clock tower, which is separated from the site by nearly 1,000m, to the extent that the sign will not be part of its immediate setting. Figure 6 reproduces the actual view from the top of the clock tower towards the site.



**Figure 6: View towards the site of the proposed signage from the top of the Central Station clock tower. The green arrow indicates the approximate location.**

Google Maps

Within this long-distance view there are several elements including railway island platforms and overhead lines, the Yard Access Bridge and contemporary office towers, between the site of the proposed sign and the clock tower. The landscaped outlook in the foreground of the proposed signage is not readily visible in this busy view corridor. A sign of the proposed size and illumination will have little, if any, visibility within this view corridor.

- *The proposed sign will be a visually detracting element in the immediate visual catchment and will have no relationship with the surrounding heritage context.*
- *The proposed illuminated signage is not in keeping with this heritage context.*

The immediate visual catchment is mixed in character. While there are heritage listed buildings, the streetscape also includes numerous contemporary elements. This reflects the fact that the context is constantly evolving, rather than static.

The proposed signage is fully compliant with respect to *Sydney DCP 2012* guidelines for digital signage. It will display static content for a minimum dwell time of 10 seconds and will be internally illuminated with lighting levels to match the surrounding environment at the site. The change-over period of less than one second will be barely perceptible to passers-by, so that to all intents and purposes the signage will be consistent with the static signage that forms part of the streetscape context.

### ***View Impacts***

- *Section 5.1.8 of the Sydney Development Control Plan 2012 (Sydney DCP 2012) identifies the Central Station clock tower as a key view within, and helps define, Central Sydney. The Sydney DCP 2012 outlines that the clock tower represents a landmark particularly when approaching or departing Central Sydney, and how the clock tower was purposely composed at the alignment of several streets so as to maximise the visibility of the clock face.*

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- *The proposed sign may have adverse visual impacts by obstructing views to the clock tower. Further, it may compete with views to the Cathedral to the north of the site.*
- *As such, the proposed signage is not consistent with the objectives of Section 5.1.8 of the Sydney DCP 2012 which seeks to preserve significant views and ensure the silhouette created by existing clock towers and roof features on heritage listed items are clearly visible against the sky.*

Section 5.1.8 of the Sydney DCP 2012 provides the following statement for the Central Station clock tower:

*Railway Square is the major visual and functional gateway to Central Sydney from west and south. The clock tower of Central Station was purposely composed at the alignment of several streets from the north, south, east and west, so as to maximise the visibility of the clock face. The prominence of the clock tower contributes strongly to the visual prominence of the Square. The clock tower represents a landmark particularly when approaching or departing Central Sydney along Broadway and George Street.*

The original landmark status of the clock tower has been challenged by the construction of buildings of much greater height on Pitt and George Street, which lie in much closer proximity to the clock tower than the site of the proposed sign. The principal view corridors towards the clock tower, as noted by the DCP statement above, are obtained from the immediate north, east and west of it. It is within these view corridors that its relationship to the terminus below is most readily appreciated. The proposed sign is located to the south of the clocktower at a distance of nearly 1,000m.

The proposed signage is located adjacent to the railway corridor. It will be largely concealed from view on approach from the south on Regent Street by landscaping. The main view corridors that include both the proposed signage and the Central Station clock tower is obtained from either within the railway corridor or from the Lawson Street bridge well to the south. In either case, the view would be of the rear of the signage structure, with no advertising visible. As set out above, the proposed signage is separated from the Central Station clock tower by nearly 1,000m. If the proposed sign obstructs views towards the clock tower, the reduction would be minimal given the small proportions of the sign, the distance to the clock tower, the existing impediments in this view corridor and the width of the vantage point provided by the bridge.

With respect to the Cathedral, its setting has also changed as the Cleveland Street/Regent Street junction over the railway lines has developed and larger scale buildings, such as the Surry Hills Post Office and new Inner Sydney High School have been built in its vicinity. Views towards the Cathedral are limited to a slot view through the main entry gates on Cleveland Street. Views from the south and west, near the site of the proposed signage, have been reduced by extensive tree growth on the boundary of the item which conceals all but the uppermost section of tower of the cathedral. The trees provide a visual buffer between the Cathedral and the rail and road corridors. Refer to Figures 7 and 8.



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**Figure 7: View from the south on Regent Street looking towards the approximate site of the proposed signage (green arrow).**

Urbis 2023; annotations by WPH&P.



**Figure 8: View from the west on Cleveland Street looking towards the site of the proposed signage (green arrow).**

Urbis 2023; annotations by WPH&P.

As illustrated by Figures 7 and 8, the proposed sign will not block views towards the Cathedral. There is a clear separation distance between the proposed sign and the item in significant view corridors. These view corridors include extensive contemporary streetscape elements in between the proposed sign and the item. Given this separation distance, the small size of the sign and the fact that it will be of a lower height than the tree line surrounding the Cathedral, it is considered that the item will remain the dominant element, where viewed against the sky.

## Conclusion

This letter has responded to the issues raised by the City of Sydney Council regarding DA22/6816. The proposal will facilitate high-quality signage for advertising and other community messaging in an area with busy foot and vehicular traffic. The proposed sign is in a mixed streetscape that is constantly evolving, rather than static. It includes numerous contemporary elements that are consistent with the proposed signage. Where visible in conjunction with these items and HCA, it will present as visually subordinate by virtue of its size, separation distance, the existing visual impediments that lie between, as

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well as the width of the vantage points provided by the bridge. The heritage items, including their roof features and landmark status, will be retained and will remain dominant against the skyline.

Please do not hesitate to contact me on 8076 5317 if you have any questions.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'James Phillips', with a stylized flourish at the end.

**James Phillips** | Principal