

26 March 2024

Our Ref: 2024/191562
File No: R/2022/18/B

Daniel Neely
Para Planner
Department of Planning, Housing & Infrastructure

By email: daniel.neely@dpie.nsw.gov.au

Dear Daniel,

Advice on DA 22/7946 – Amended digital advertising signage – Intersection of Enmore Road & King Street, Newtown

Thank you for your correspondence dated 12 March 2024 inviting the City of Sydney Council (the City) to provide advice on the amended digital advertising signage application at the intersection of Enmore Road and King Street, Newtown.

The City has reviewed the amended proposal and advise that our same concerns remain as raised in our previous submissions dated 19 October 2022 and 26 June 2023. The City therefore maintains its strong objection to the proposal and recommend that the Department of Planning, Housing & Infrastructure (DPHI) refuse this application.

1. Amended design

It is understood that the proposed digital advertising sign has now been relocated further along Enmore Road (approximately 30 metres south-west) so that it is just outside the 'Newtown Railway Station group and Former Newtown Tramway Depot' State heritage listing boundary, and no longer physically attachment to the King Street Overbridge which is part of the listing.

However, there are no significant changes to the design, size and scale of the sign, and no genuine efforts to alleviate the issues of visual clutter, nor its impacts on the character of the area, as detailed in the sections below.

2. Heritage and streetscape impacts

Whilst the proposed digital advertising sign is no longer located within the State heritage listing technical curtilage, it will be located within its visual curtilage as it will be very close to the King Street Overbridge and will clearly be seen from the 1890's Overhead Booking Office. The large size, form and nature of the proposed sign does not complement the State heritage item.

The proposed advertising sign is located within the King Street and Enmore Road Heritage Conservation Area (HCA) under the Inner West Local Environmental Plan 2022 (IWLEP), and directly adjacent to the King Street HCA in the Sydney Local Environmental Plan 2012 (SLEP). It will detract from, and not be consistent with, the historical character of both HCAs noting that the sign remains to extend beyond well

above the typical awning height in the locality, be out of scale with its surrounding context, and will contribute to visual clutter noting its close proximity to the Oporto business identification sign further west along Enmore Road.

The sign will obscure and clutter important westward views along King Street and Enmore Road and will visually compete with the finer grained elements that comprise the streetscape of Enmore Road.

The 6 existing signs on the side of the Overbridge that are proposed to be removed under this application, are smaller in height, are static, and are located below the balustrade height and parallel to the street. Whereas the proposed signage structure will be a lot more prominent, being a height more than 5.2m above the top of the bridge balustrade and will contain a large digital sign (3.1m wide by 4.7m wide) that is angled to face vehicular traffic travelling westwards.

3. Visual impacts

No significant changes have been made to the size and scale of the advertising sign to reduce its visual impacts. Although the depth has been slightly reduced by 50mm, the actual digital screen size remains as originally proposed, which is excessive in height and scale, is completely overbearing to its surrounding and contributes detrimental visual bulk and clutter within the locality.

A revised VIA has been submitted. The VIA now only presents a visual catchment to the eastern side of the sign. As advised previously, the proposal is for a large, oversized structure and it is incorrect to assume that the only visual impact will be from the side where the digital advertising can be viewed.

4. Inconsistency with the Industry and Environment SEPP 2021

We again disagree with the Proponent's assessment against Schedule 5 of the Industry and Employment SEPP for the reasons outlined in this letter. The sign, which has no significant design changes, remains to have a detrimental impact on the State heritage item, the HCAs it is located within and adjacent to, and the surrounding streetscape. A slight relocation of the sign is not sufficient in resolving these impacts.

5. Public benefit

The amended application provides no additional response to the issues raised by the City with regard to the public benefit, with the same Public Benefit Statement (dated 22 March 2022) lodged with the original proposal being re-submitted.

No further detail has been provided to clarify that the proposed 'improvement and maintenance programs' are and how this demonstrates a direct link to public benefit.

Our position therefore remains that there is insufficient information provided to demonstrate how the proposal will provide a direct public benefit, other than creating a revenue that will be invested back into the public transport network, which is an existing core responsibility of Sydney Trains.

In summary, the City strongly objects to the proposed sign due to the issues raised in both this letter and our previous submissions. The City therefore recommends that DPHI refuse the application.

As noted in our previous letter, the City has significant concerns not only with the specific detrimental impacts of this particular sign, but also the cumulative impacts of the significant number of similar digital advertising signs proposed by Sydney Trains within and in close proximity to the City of Sydney local government area, which raise similar issues relating to visual impact and a lack of public benefit.

Should you wish to speak with a Council officer about the above, please contact Mia Music, Senior Planner, on 9265 9333 or at mmusic@cityofsydney.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'GJahn', with a stylized, flowing script.

Graham Jahn AM LFRAIA Hon FPIA
Director
City Planning | Development | Transport