



DA 23/2904 or PAN -310946. Monopole Digital Sign

By lodgement: [NSW Planning Portal](#); luninda.craig@dpie.nsw.gov.au; Anthony.watson@planning.nsw.gov.au

June 9, 2023

**Lucinda Craig
Planning & Assessment
Department of Planning and Environment
GPO Box 39
Sydney, NSW 2001**

CC: Mr Anthony Witherdin, Director, Key Sites Assessments

Dear Lucinda,

Subject: Applicant response to City of Ryde letter dated May 29, 2023. CoR Ref: COR2023/16. Eden Garden, M2 Motorway.

I refer to the City of Ryde (COR) letter dated 29 May 2023 in relation to DA 23/2904. In relation to the concerns raised by COR within their letter, the Applicant notes two issues, namely 1. Visual Clutter and 2. Location of certain names and signs.

Having regard to the issues raised, COR have formed the "view that this development application should be refused".

As part of the DA stakeholder engagement process, The Applicant wrote to Mr Wayne Rylands, General Manager, City of Ryde Council (COR) on 1st March 2023 to advise COR of its intention to apply for two new digital signs on the M2 motorway in Ryde LGA. The letter provided project background and sought feedback, including an offer to provide additional information to COR, including briefing meet(s). A copy of the letter send by the Applicant to ROC is attached for your ease of reference. The applicant received no response from ROC to the Applicants' offer for meeting(s) or to provide additional information which is unfortunate as the concerns raised by ROC could have been readily addressed by the Applicant without the time and expense involved for both parties to write and respond to each other's letters.

In any event, the Applicant provides the following point by point responses to the concerns raised within the COR letter dated May 29, 2023:

1. Visual Clutter

Issue 1.1: COR state within their May 29, 2023, letter: "Appendix C of the Statement of Environmental Effects (SEE) (page 170) lists the SEPP's Schedule 5 Assessment criteria but does not respond to the specific criteria. This includes key considerations and questions relating to impacts on the character of the area, views and vistas, settings, or landscape. The SEE should be revised to thoroughly address Schedule 5".

Response 1.1. The Applicant respectfully submits the SEE does comprehensively address compliance at 4. Statutory Compliance, pages 35 - 66 inclusive, including a full and thorough assessment against the Schedule 5 Criteria.

Issue 1.2: COR state within their May 29, 2023, letter: "*The proposed Eden Gardens digital sign is the first freestanding advertising sign to be built along the M2. The sign is large and in close proximity to another large format road sign (that faces the other direction). In addition to this, there is another very large sign on the Lane Cove Road bridge within the same visual catchment (refer street view below).*

Image inserted by Ryde within their May 29, 2023, letter.

Council considers that placement of a second sign in this location is unwarranted. It will create visual clutter along a section of the motorway that has exceptional green vegetation corridor.

Currently the area adjoining M2 comprises predominantly of trees and dense vegetation which presents aesthetically pleasing views for motorists in addition to traffic safety. The proposed cluttering of advertising signs would block the existing tree line. The proposal with multiple signage structures and displays within close proximity to each other would be distraction for motorists. Further, the proposed sign would not be compatible with the amenity and visual character of the area".

Response 1.2 The Applicant responds to COR concerns as follows:

- 4.2.3 of the SEE addresses Transport Corridor Advertising and Signage Guidelines 2017, [pages 55 – 62 inclusive](#). Table 2.4 in 4.2.3 addresses Visual Clutter, [page 58](#).
The SEE states "There is no other advertisement located on the site. There is an existing large format directional traffic sign, but this is orientated to face inbound motorists. The proposed digital sign faces outbound motorists. The introduction of the digital screen will not give rise to visual clutter".

Bitzios Consulting also examined distances between signs (vehicles travelling in the same direction) which is included in Table 4.5(l) of the SEE.

Further, The Street View image supplied by COR within their letter of May 29, 2023, (page 2) is unfortunately not an accurate representation of the outcome were the proposed new sign to be constructed. The image has been captured on the opposite side of the road to that which outbound drivers will be travelling and incorrectly suggests the new digital sign and the existing digital sign situated on the Lane Cove Bridge can be seen together. This will not be the case when viewed from the outbound lanes by drivers. The two digital signs are in two separate visual catchments and cannot be view concurrently by drivers on the M2. Kindly refer to the Bitzios Consulting advice letter in relation to this issue which has already been provided to you (reattached for your ease of reference)

COR notes the new sign is situated adjacent to a green vegetation corridor. However, the new sign is an insignificant size when viewed in the context of the extensive length of the corridor and will not impact the existing green vegetation corridor.

The applicant contends the new single digital sign will not “impact the character of the area, views and vistas, setting or landscapes”. as the new sign has been designed to be situated below the dominant skyline, refer SEE page 56 (extract below).

SECTION 1.5 TABLE 1 LAND USE COMPATIBILITY CRITERIA (SEE)

The proposed digital sign sits well below the dominant skyline created by the adjacent vegetation buffer and tree canopy. It will not obscure or compromise scenic views of the area. It is of a modest 6.3 metre height and is orientated at 45 degrees to the road reserve to its primary viewing audience which is outbound motorists.

The Applicant reconfirms the existing Deed in relation to advertising on the M2 Motorway anticipated 44 signs be installed. Sixteen signs have been installed to date along the 21 km corridor. The additional sign approvals currently being sought, as well as the existing signs, are in total well short of the agreed threshold set with Transport for NSW.

In the Eden Park zone only 1 other digital advertising sign exists, the Lane Cove Road bridge sign, and that sign will not be visible concurrently with the proposed sign by a driver.

Issue 1.3: COR says the “SEE does not adequately consider the impact of sign spacing on driver distraction/views. Specifically, the spacing between the location of the proposed digital advertising sign and existing advertising signage located on the Lane Cove Road bridge (heading west)”.

Under the Transport Corridor Outdoor Advertising and Signage Guidelines: - sign spacing should limit drivers’ view to a single sign at any given time with a distance of no less than 150m between signs in any one corridor.

The separation between the proposed sign location and signage on the Lane Cove bridge is measured to be approximately 230m. Although that distance is more than 150m between signs, that figure is a minimum / ‘no less’ suggesting that the greater the separation between signs the better. The speed limit is 100km/h and with drivers travelling at speed, Council considers that the impact of sign spaces requires further analysis”.

Response 1.3: COR raise the concern the proposed sign will be seen in conjunction with an existing digital sign situated on the Lane Cove Road bridge. However, this is not the case. The spacing between the two signs of approximately 230 metres [Ryde Council assessment and significantly greater than the 150m minimum guideline] and the natural curve in the motorway, totally separates the two locations visually and complies with the Transport Corridor Outdoor Advertising and Signage Guidelines 2017.

The image included in the City of Ryde letter at page 2 is a misrepresentation of the real situation. The image provided by the Council is from Google Street View and looks Northwest from the opposite side of the road to that which drivers will observe the proposed sign. Note - the image provided is looking into oncoming traffic on the opposite side of the roadway. This will never be the case.

Only drivers traveling Northwest [outbound] will see the new sign from the correct side of the motorway. The new sign and the existing sign on the Lane Cove overpass will not be seen together.

Road Safety consultant Bitzios has provided a letter confirming the two signs will not be seen concurrently, letter attached. Furthermore, TfNSW have assessed the safety criteria for the new sign and accepted the applicant's supporting information.

2. Location of certain names and logos

Issue 2: COR have concerns in relation to Clause 3.18 of the SEPP, which is addressed within, page 48 of the SEE, specifically that *"the name/logo should be included within the advertising display area/ calculation"*.

Response 2: Page 48 of the SEE should be read in conjunction with 3.2 Definitions, advertising display area, page 37 of the SEE.

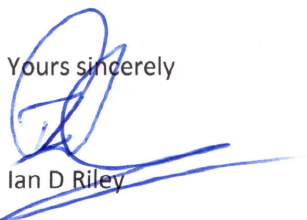
The definition is clear that the area permissible includes a logo box within the maximum calculation of 42sqm. For Eden Park the total area is 41.76sqm.

The Applicant hopes this response fully addresses the concerns raised by COR.

The Applicant is not aware of any representations by residents of the Ryde LGA. The Applicant therefore submits the information provided within the SEE, together with this letter and attachments, adequately addresses the concerns raised by ROC within their May 29, 2023, letter.

Can you therefore kindly confirm this response and the information as submitted within the DA has adequately addressed the items raised by COR.

Yours sincerely



Ian D Riley

Director

Manboom Signage Pty Ltd