

Portal Application Number: PAN-385796

Our ref: DA 23/15294

Mr Greg Attewell  
Sydney Trains  
36-46 GEORGE STREET  
BURWOOD NSW 2134

12 March 2024

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**Subject: PAN-385796 – Digital Signage on Pacific Highway, Hornsby**

Dear Mr Attewell,

I refer to the above Part 4 development application for a proposed digital signage on the Pacific Highway at Hornsby (PAN-385796), submitted via the Planning Portal on 17 November 2023 (the application).

After careful consideration, the Department requests that you provide the additional information outlined in **Attachment A** in accordance with clause 36 of the *Environmental Planning and Assessment Regulation 2021* (the Regulation). At the date of this letter, 53 days in the assessment period have elapsed. The Department requests that you provide the consolidated response by **26 March 2024** via the NSW Planning Portal. If you are unable to provide the requested information within this timeframe, you are required to provide, and commit to, a timeframe detailing the provision of this information.

If you have any questions, please contact Natalie Froud, Planning Officer on (02) 8275 1684, or via email at [natalie.froud@dpie.nsw.gov.au](mailto:natalie.froud@dpie.nsw.gov.au)

Yours sincerely

A handwritten signature in black ink that reads "M. Garland".

Mary Garland  
Team Leader, Transport and Water Assessments

As delegate for the Minister for Planning and Public Spaces

Enclosed: Attachment A

## Attachment A

### 1. Sight Stopping Distance

- The Digital Sign Safety Assessment only identified one hazard source as requiring a stop -the red signal from the signalised traffic intersection. There are other hazards associated with hazardous stops for road users, such as back-of-queue due to traffic conditions, vehicles turning left into Government Road or stopping to wait for pedestrians to cross Government Road. Please detail all potential hazards and the implications in terms of the safe sight stopping distance(s).
- The Digital Sign Safety Assessment uses a driver reaction time of 1.5 seconds. Two seconds should be used for sight stopping distance calculations as per Footnote 4, Table 5.5, of the Australian Road Guidelines Part 3. Please provide justification as to why a reaction time of 1.5 seconds is considered suitable. Further, calculate the sight stopping distance using a driver reaction time of two seconds.
- It is understood that a conservative design speed of 10 km/h above the posted legal speed limit is typically used to calculate the safe sight stopping distance. Please justify why a design speed of 60 km/h was used for this assessment. Also, please provide a calculation of the stopping distance using a design speed of 70 km/h.

### 2. Clear Zone Safety

- The assessment indicates that the edge of the display sign is likely to be offset four metres from the edge of the traffic lanes. The monopole would be offset around six metres. The Austroads Guide to Road Design outlines that a clear zone should be a minimum of five metres at a design speed of 60 km/h. It is understood that it is common practice in road design to adopt a higher speed, typically 10 km/hr above posted speed limit when calculating the clear zone.
- Please justify why a design speed of 70 km/h was not used for the clear zone analysis. Further, please justify why a clear zone offset of less than five metres is acceptable, outlining the associated risks and implications for traffic incidents where a vehicle may run off the road.

### 3. Distraction Risk

- The Digital Sign Safety Assessment does not address all of the potential distraction risks associated with the sign on road users (motorists, pedestrians and cyclists). Please assess the risk of distraction posed by the sign on:
  - motorists and cyclists turning from Government Road onto the Pacific Highway. The assessment fails to acknowledge that the sign would be visible to drivers exiting from

Government Road and that they would need to look left before pulling out to make sure that the traffic lane is clear and that there are no stopped vehicles preventing them from turning onto the highway;

- motorists and cyclists turning left into Government Road from the Pacific Highway; and
- pedestrians heading north along the highway and crossing over Government Road.

The assessment should be based on the worst-case scenario that the sign will be highly distracting.

- The Digital Sign Safety Assessment assumes that the proposed sign would be in a driver's peripheral view. It is considered that the sign would be within the lateral scan of the road and verge ahead. Please discuss the distraction risks associated with the sign based on it being within a driver's lateral view.

#### 4. Risks associated with the digital sign outcompeting directional signages

- There is no acknowledgement that from certain points the proposed sign and directional sign would be in the same vertical field of view. As such, the sign could outcompete the directional sign for the driver's attention. Further, the assessment only discusses the visibility and legibility of the directional sign and not the impact that it would have on lane-choice implications and possible multiple manoeuvres as drivers change lanes.
- Please address the impacts that the proposed signage could have on drivers' decision-making elements, such as changing-lanes, which would be made based on the directional signage.

#### 5. Inconsistency with the Transport Corridor Outdoor Advertising and Signage Guidelines

- The placement of the sign is inconsistent with Section 3.2.3 of the *Transport Corridor Outdoor Advertising and Signage Guidelines* (Department of Planning and Environment, 2017) (the 2017 Guidelines). Section 3.2.3 of the 2017 Guidelines states that an advertising sign should not be located where it is visible from the terminating leg of a T-intersection. The sign would be visible from Government Road which is the terminating leg of T-intersection with the Pacific Highway. Please provide justification as to why the non-compliance with the 2017 Guidelines is acceptable.

#### 6. Assessment against Schedule 5, State Environmental Planning Policy (Industry and Employment) 2021

- Section 3.1 of the Safety Assessment states that Schedule 5 -clause 7 of *State Environmental Planning Policy (Industry and Employment) 2021* is unrelated to road safety. This is not correct as illumination could cause glare for drivers. Please provide a response to the relevant requirements in Schedule 5, clause 7.

### 7. Decision-making requirements

- The Digital Sign Safety Assessment only considers the competition between the directional signage and proposed digital signage. Please assess other decision-making requirements such as the competition between the proposed signage vs the closing gap ahead of the road user, the proposed signage vs the traffic signals and the proposed signage vs pedestrian movements.
- The desire lines provided in the Digital Sign Safety Assessment are limited to the area immediately surrounding the sign. The subject area is one of high pedestrian activity and it is considered that the desire lines should have been extended to take into account the key destination points of Hornsby Station and the Westfield Shopping Centre. Walking is the most fluid, unrestricted form of movement around roads and pedestrians often take the shortest route available. Please provide an assessment of the potential risks of wayward pedestrian movements where a pedestrian may be distracted by the sign.

### 8. Other issues

- Details on utility services required to operate the sign have not been included. Please advise whether the services form part of the development or if they will be provided under another approval pathway. If these are to form part of the development application, details must be provided on the services along with an assessment of the construction impacts associated with providing the services.
- No details have been provided on the existing buried services, noting that there is a high pressure gas main in the vicinity of the proposed sign. Please provide details on all existing buried services and the measures that would be implemented to protect these during construction of the proposed sign.