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Statement of Environmental Effects

S.4.55(2) Modification Application

Glebe Island Silos, Rozelle

Three (3) Year Extension to the Consent Duration

Prepared By

Urban Concepts

In Conjunction With

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Prepared on Behalf of

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EXECUTIVE SUMMARY

Section 1. Introduction pg.17-24

EXISTING DEVELOPMENT CONSENT

The Glebe Island Silo roof signage has existed on the Glebe Island Silos for 32 years. In this time the signage has undergone multiple Development Applications and Modification Applications. The current consent DA 21/13182 was granted on the 9th of September 2022 for a period of three (3) years. The signage, as approved under DA 21/13182 is located and covers the top of the southern and western elevations in accordance with the provisions of the Glebe Island Silos Development Control Plan 2004.

MODIFICATION TO CONSENT

This Statement of Environmental Effects (SEE) has been prepared by Urban Concepts on behalf of The Applicant Eye Dive Sydney Pty Ltd (A Fully Owned Subsidiary of oOh!media Limited) to accompany a Section 4.55(2) Modification Application to amend Conditions A2, A4 and A5 of DA 21/13182 granted on 9 September 2022 to extend the consent duration relating to the display of general advertising signage on the Glebe Island Silos for a further three (3) year term. No other change to the development is sought by this Modification Application. Condition A2 will be modified by updating the previous technical reports submitted with the DA 21/13182. Condition A4 will be modified to correct two typographical reference errors. The new wording for Condition A5 is below.

A5 This development consent is issued for a limited period of ~~three~~ six years. The consent will cease to be in force/expire ~~three~~ six years after the date of consent.

OVERVIEW OF EXISTING SIGNAGE

STATISTICS	WESTERN SIGN	SOUTHERN SIGN
Dimensions of signage	6.1metres height x 22.1 metres in length	6.1 metres height x 170 metres
Height of signage to top of sign	Silos parapet height approximately 50 metres	
Advertising display area	134.8 square metres	1037 square metres
Form of illumination	External – 6 cantilevered down lights	External - 43 cantilevered down lights
Hours of illumination	Night Illumination until 11pm	
Signage Categorisation	General Advertising Roof Sign	

WESTERN SIGN



SOUTHERN SIGN



PRE APPLICATION CONSULTATION

A pre application meeting with the DPHI was held on the 30 July 2024 to identify and address any matters of concern. This meeting included attendees from Urban Concepts, oOh!media (The Applicant) and a representative from the Port Authority of NSW (The landowner).

Section 2. Site Description and Environmental Context pg. 25-52

- The Glebe Island Silos site is located at Sommerville Road, Glebe Island. The site is located within the Inner West Local Government Area. The site is legally described as Lot 11 in DP1288503 and Lot 13 in DP11707, being the lots over which Eye Drive Sydney Pty Ltd has a lease. The site is under the care, control and ownership of the Port Authority of NSW. Glebe Island is a working port used for deep water wharfage and storage including bulk cement, sugar, gypsum loading and unloading.
- The Silos are identified as a local heritage item in Schedule 4 of the Precincts SEPP 2021 and as a heritage item on the Port Authority of NSW Section 170 register. The silos are within proximity to White Bay Power Station (SHR Listing No: 01015), Glebe Island Bridge (SHR Listing No: 01914), Glebe Island World War II Monument (SHR Listing No: 4560012), Glebe Island Plaque - Opening of Container Terminal (SHR Listing No: 4560013), Glebe Island Sandstone Quarry Sample (SHR Listing No: 4560014) and Glebe Island Dyke Exposures (SHR Listing No: 4560056).
- Glebe Island is a reclaimed peninsula to the south of Balmain and is surrounded by water to the north (White Bay) south (Rozelle Bay) and east (Johnstons Bay). Surrounding suburbs include Balmain to the north, Rozelle and Lilyfield to the west, Annandale to the southwest, Glebe and Forest Lodge to the south, Ultimo to the south east and Pyrmont to the east.
- The site is surrounded by major roads, this includes the Western Distributor (Anzac Bridge), City West Link, Victoria Road and James Craig Road.
- The immediate visual context and visual character of the site is of low scenic quality and includes a variety of built forms and features that are vernacular to former wharfs and industrial settings.
- The visual character of the surrounding context includes transport infrastructure (both road networks and public transport systems), harbour functions and open spaces.
- The surrounding desired future visual character will include mixed-use development, higher density and high-rise buildings to the west of the Silos as planned in Stage 1 Bays West.

Section 3. Strategic Planning Context and Justification for this Application pg. 53-64

STRATEGIC PLANNING CONTEXT

In 2015, Urban Growth released *The Bays Precinct Sydney Transformation Plan*. The Glebe Island Silos form part of the land that has been designated by the NSW State Government as Bays West. The strategic planning framework for the site and its environs is established under a suite of plans that are described below:

- **The Bays West Place Strategy 2021**

A key direction of the Bays West Place Strategy is to retain, manage and allow the essential strategic port and maritime industry uses to grow, and continue to support the NSW economy. It recognises the Glebe Island Silos as an iconic element which reinforces the distinctive industrial maritime character of Bays West. Under the strategy the Silos are retained, and opportunities exist for either the continuation of existing uses and/or the introduction of new uses. The Strategy identifies ten (10) Sub-Precincts which will undergo a Master Planning and Rezoning Process. The Silos are in Sub-Precinct 3. Sub-Precinct 1, White Bay Power Station (and Metro) has been Master Planned and Rezoned under Bays West Stage 1.

The Bays West Place Strategy is supported by:

- The Strategic Place Framework
- The Urban Design Framework and
- Connecting with Country Framework

- **The Bays West Place Based Transport Strategy 2022**

The Bays West Place Based Transport Strategy was released post the consent of DA 21/13182 in September 2022. The strategy provides a high-level transport planning analysis which aims to address strategic transport constraints and opportunities in Bays West.

- **The Bay West Stage 1 Master Plan And Rezoning 2022**

The development of Bays West Stage 1 will take 5-8 years, in line with the opening of The Bays Metro Station which is now forecasted to open in 2032.

The Stage 1 Master Plan and Rezoning proposal aims to deliver:

- 78,000sqm of commercial floor space (5,412 jobs) including office and retail premises.
- 23,900sqm residential floor space (250 dwellings).
- 41,650sqm of new public open and green space.
- The revitalisation and protection of heritage-listed White Bay Power Station.
- Supporting social infrastructure including a district multi-purpose community/library hub.
- Improved public and active transport, including cycleways.

- **The Stage 1 Bays West – White Bay Power Station (And Metro) Design Guide 2022**

Stage 1 has been broken into four (4) key development sites. The Glebe Island Silos are located immediately adjacent to Site A, this includes the metro with no residential development present. Site B is located to the Southwest of the Glebe Island Silos and is proposed to be a vibrant mixed-use development. The 5–8-year development timeline of the proposed residential dwellings will not coincide with the proposed three (3) year extension to the consent duration.

- **The Bays West Transport Oriented Development Accelerated Precinct**

Bays West has been identified by the DPHI as a Transport Oriented Development (TOD) Accelerated Precinct. The rezoning will go on public exhibition in mid-2025.

JUSTIFICATION FOR THE APPLICATION

- If this Modification is approved and the consent duration is extended for a further three (3) years, the consent would expire in September 2028. This is two (2) years earlier than the development outcomes envisaged under the Bays West Place Strategy 2021.
- Following the approval of DA 21/13182 the Port Authority entered into a commercial lease agreement with the Applicant Eye Drive Sydney Pty Ltd for the ongoing display of the existing signage at the top of the Glebe Island Silos, given their understanding that Sub Precincts 3,4 and 5 would not be developed before 2030.
- In 2021 when the proponent was preparing the now approved DA 21/13182, both the Department of Planning, Industry and Environment (now the DPHI) and Inner West Council acknowledged that it would be unlikely that any development would occur to Sub-Precincts 3,4 or 5 prior to 2030 given the substantial master planning required to establish the detailed development scenarios for each Sub-Precinct.
- As the existing advertising signage is identified as a 'roof sign' under the provisions of Clause 3.19 of the IESEPP 2021, the maximum consent duration that can be applied to any consent is ten (10) years. The proposed Modification to DA 21/13182 only seeks an additional three (3) year term, which will provide for a total consent duration of six (6) years through to 2028.
- Further to the above, each of the specialist consultants reports that have been commissioned for this Modification Application have examined the future land use scenario that is envisaged in the immediate vicinity of the site. The Electrolight Australia Lighting Impact Assessment (LIA) concludes that if development within the Southern Development area (Site B of the Bays West Stage 1 Design Guide) did occur within the three (3) year term being sought under this Modification, that the existing luminance of the signage can remain unchanged. Urbis concludes that the signage is compatible with the highly activated and fine grain transport orientated development in Site A and B of Stage 1:

We note the high compatibility of the signage with the future desired character of Site B as a diverse, highly activated and fine grain transit oriented development, where signage inevitably forms part of the visual context.

Section 4. Description of the Proposed Modification pg. 65-73

PROPOSED MODIFICATION

This Modification Application does not propose any changes to the physical form of the approved signage. This Application only seeks to modify Conditions A2, A4 and A5 of the consent instrument for DA21/13182. Condition A2 will be modified by updating the previous technical reports submitted with the DA 21/13182. Condition A4 will be modified by updating the reference error message to condition A2. Condition A5 will be modified by extending the duration of the consent by an additional three (3) years.

ILLUMINATION

This Modification Application does not propose any changes to the physical form or the hours of operation of the illumination of the approved signage. Electrolight Australia in their LIA reviews the compliance of the existing signage lighting against all relevant requirements. The assessment found the signage lighting to be compliant with all relevant standards.

Electrolight Australia has confirmed that if residential development were to occur within Stage 1, Site B (Southern Development) within the next three (3) years, the existing luminance of the signage can remain unchanged as it remains compliant with all relevant controls and standards.

PUBLIC BENEFIT AGREEMENT

The Modification Application does not seek to alter the existing public benefit agreement which is in place. This agreement currently provides the Inner West Council with a monetary contribution of \$140,539 per annum plus GST, increasing annually in accordance with the CPI, for the duration of the consent. The public benefit current satisfies the requirements of Clause 3.11 of IESEPP 2021 and Inner West Council's Assessment of Proposals for Outdoor Advertising and Structures in Transport Corridors.

Section 5. Section 4.55(2) Assessment pg. 74-76

The proposal can be determined under Section 4.55(2) of the EP&A Act. The proposed Modification is substantially the same development as that approved under the existing development consent. Legal advice prepared by Norton Rose Fulbright Australia confirms this position.

In accordance with Section 4.55(2)(c), the DPHI will notify this Application for a period which is consistent with the timeframes required by the EP&A Act 1979 Regulations. The original DA was widely notified including Government Agencies, The Inner West and The Council of the City of Sydney, as well as the public.

In accordance with Section 4.55(2)(d) the Applicant will consider and respond to any relevant submissions made during the public exhibition and lodged within the notification period, as required.

Section 6. Environmental Assessment pg. 77-127

SECTION 4.15 (1)(A) ENVIRONMENTAL PLANNING INSTRUMENTS, DRAFT INSTRUMENTS, DCP'S AND PLANNING AGREEMENTS

The Modification has been examined against the relevant environmental planning instruments and adopted policies. These are as follows:

- State Environmental Planning Policy (Precincts - Eastern Harbour City) 2021.
- State Environmental Planning Policy (Industry and Employment) 2021.
- Transport Corridor Outdoor Advertising and Signage Guidelines 2017.
- Glebe Island and White Bay Master Plan 2000.
- Glebe Island Silos Advertising Signage Development Control Plan 2024.
- Bays West Place Strategy 2021 and supporting documents.
- State Environmental Planning Policy (Biodiversity and Conservation) 2021.

The assessment has drawn from specialist advice in lighting, traffic, ecology and visual impact. It demonstrates that the display of the existing signs of the western and southern elevations of the Silos complies in full with the stated provisions and that a three (3) year extension to the consent duration can be supported under the relevant planning provisions.

SECTION 4.15 (B) OTHER IMPACTS OF THE DEVELOPMENT

Amenity and the Surrounding Land Uses

The independent specialist investigations that assess the visual, heritage, ecological, lighting and traffic safety impacts of extending the consent duration for a three (3) year term have not identified any matters that would render the proposed Modification as having an adverse or undesirable impact on existing or proposed future surrounding land uses.

Socio and Economic Factors

To satisfy the Public Benefit provisions of IESEPP, this Application will maintain the existing Public Benefit Offer that accompanied the Development Application. This monetary contribution will continue to be paid annually by Eye Drive Sydney Pty Ltd (or its Parent Company) to the Inner West Council and has effect for the duration of the development consent. In our professional opinion the extension of consent will deliver a range of socio-economic benefits for both State and Local Government and the local community.

Illumination And Lighting Impact

The LIA undertaken by Electrolight Pty Ltd has concluded that the existing front lit signage installed at Glebe Island Silos complies with the following relevant criteria, guidelines and standards:

- State Environmental Planning Policy (Industry and Employment) 2021 – Chapter 3 Advertising and Signage.
- Transport Corridor Outdoor Advertising and Signage Guidelines 2017 – Section 3.3.3.
- Glebe Island Silos Advertising Signage Development Control Plan – Section 11.3 Lighting.
- Relevant Sections of AS 4282-2023 Control of the Obtrusive Effects of Outdoor Lighting.

Landscape and Vegetation Management

The proposal does not involve any landscaping works.

Utility Services

The proposal does not raise any concern regarding the provision of utility services.

Visual Impact

Urbis has undertaken a Visual Impact Assessment (VIA), to evaluate the potential impacts of the advertising signage, the potential visual exposure of the proposal, the potential effect of the proposal on the emerging desired future character of the immediate and wider locality and the potential effects on existing views from the public domain including roads, infrastructure and reserves. The VIA examined fourteen (14) views within a 500-800 metre visual catchment of the Silos. Urbis concludes that the signage generates a low level of visual effects on view composition, visual character, and visual resources of the site. Potential visual effects and impacts on future development within Bays West Stage 1 are likely to be low and limited.

Heritage or Special Area Characteristics

The NBRS has undertaken a Heritage Impact Statement (HIS) against the relative heritage controls. NBRS conclude that the following aspects of the proposal respect or enhance the heritage significance of the item or conservation area:

- Advertising signage atop the Glebe Island Silos does not diminish the significance or appreciation of the distinctive cylindrical form and large scale of the structures as it does not obscure nor damage the distinctive silos.
- The size and proportion of the signage is proportional to Silos. This retains the original form and scale of the silos.
- No changes will be made to the physical and visual relationship between surrounding historic items.
- Whilst lighting is a non-historic element, it sits alongside other lighting features on roadways and the foreshore.
- The Glebe Island Olympic Mural is not linked to the significance to the Silos. There will be no changes to the mural.
- Illumination levels and operations hours will be maintained.

NBRS conclude that the consent for advertising signage atop the existing Glebe Island Silos would not diminish the appreciation or understanding of the Silo structures and would not impact the heritage significance of the site.

Traffic, Cyclist and Pedestrian Safety

Bitzios Consulting has undertaken a Traffic Safety Assessment (TSA). They have assessed compliance against all relevant policies and traffic safety assessment criteria and have determined that the signs are fully compliant. The TSA concludes that the ongoing display of the signs should be approved, given the following conclusions:

- The illumination, size and location of the signs will not change.
- Given the raised location of the signs, they do not obstruct any view or restrict a sight distance to any intersections, traffic control devices, vehicles, pedestrians or cyclist.
- The signs have been located on the Silos for 32 years, making them insignificant to most drivers. It would be a rare event for the signage to be purposefully glanced at by a passing driver.
- Throughout the 32 years there has been no evidence that the signs have reduced safety in the past and is unlikely in the future due to its location within a drivers ordinary field of view.
- The 5 years of crash data within 555m of the signs show a low crash rate.
- The sign complies with Industry and Employment SEPP 2021, Transport for NSW Advertising Sign Safety Assessment Matrix and the Transport Corridor Outdoor Advertising and Signage Guidelines 2017.

SECTION 4.15(C) SUITABILITY OF THE SITE FOR DEVELOPMENT

The signage, together with the structural signage system, are designed in a manner that is sympathetic to the industrial and maritime character of the Port Authority land. The ongoing display of signage can occur without any reduction to the functionality of the Silos in the maritime and industrial precinct of White Bay.

The strategic planning framework for Bays West indicates that there is little or no prospect of any new residential development occurring within Sub-Precinct 1 (Stage 1) in the next three (3) years. This position has been supported by the DPHI during pre lodgement consultation. Therefore, the subject site remains a suitable location for the ongoing display of the roof signage for a further three (3) years.

The signage complies in full of the development standards that are contained in the Glebe Island Silos Advertising and Signage DCP 2004.

NBRS Architects has determined that the display of signage on the Silos represents a successful adaptive reuse of the heritage item.

SECTION 4.15 (E) PUBLIC INTEREST

After fully considering all aspects of the proposal it is our professional opinion that extending the duration of the consent for an additional three (3) years is in the public interest for the following reasons:

- The proposal incorporates a Public Benefit in the form of a significant monetary contribution to the Inner West Council.
- It will not result in any significant adverse impact. This has been confirmed by robust independent investigations into visual impact, heritage impact, traffic safety, ecology and illumination.
- It can be supported on statutory planning and policy grounds and raises no matters of non-compliance.

- It will enable the Port Authority and Eye Drive Sydney to realise the commercial term of the current lease agreement.
- It will not impede the working of the port in servicing the NSW Infrastructure supply chain.
- It is unlikely, given the current strategic planning status, that any residential development would occur in the area surrounding the advertising signage within the next three years (3) years. Therefore, a three (3) year extension would not have an adverse impact on the strategic planning intent and desired future character.

Section 7. Conclusion pg. 128-129

The proposed Modification to extend the consent duration of DA 21/13182 for a further three (3) years is considered appropriate and acceptable for the following reasons:

- The appearance of the advertising structure will remain the same as the result of the Modification.
- The Silos are located adjacent to a significant arterial road network that incorporates the Anzac Bridge. This makes the Glebe Island Silos an effective outdoor advertising location.
- Independent and robust investigations into traffic safety, visual impact, and illumination have confirmed that there are no adverse amenity impacts arising from the display of the signage for an additional three (3) years.
- The EAR produced by Cumberland Ecology has concluded that there are no adverse impacts on either birds or bats within the vicinity of the site.
- The proposed extension to the duration of the consent will not alter the existing public benefit arrangement. It will continue to deliver an annual monetary contribution to the Inner West Council throughout the duration of consent.
- The continued display of the signage is supported on statutory planning and policy grounds and raises no matters of non-compliance.
- An extension to the consent duration will enable the Port Authority and Eye Drive Sydney to realise the commercial term of the current lease agreement.
- A structural assessment has been undertaken of the steel sign framing signage structure and has determined that the southern and western framing systems are structurally adequate and compliant with the relevant Australian Standards.
- The signage has existed on the upper parapets of the Silos for 32 years and it can satisfactorily coexist on the structure without impeding the workings of the Glebe Island Port.
- There is no likelihood of any new residential development being delivered under the Bays West Precinct Stage 1 rezoning within the next three (3) years. A three (3) year extension will not impact the planning and development timeline for the release of any further rezonings within the Bays Precinct including the 2025 Bays West TOD rezoning.
- The signage reinforces the landmark quality of the Silos structure, and the proposed Modification will prolong its role as an iconic out of home advertising asset that is sought after by global entities seeking premium brand promotion.

The proposal to modify development consent DA 21/13182 represents a well-considered and desirable outdoor advertising and asset management outcome. It is our professional opinion that the proposal to extend the consent duration of the roof advertisements that are displayed on the southern and western elevations of the Glebe Island Silos should be favourably considered and the development consent modified accordingly.

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1. INTRODUCTION

This Statement of Environmental Effects (SEE) has been prepared to accompany a Section 4.55(2) Modification Application to amend Conditions A2, A4 and A5 of DA 21/13182 granted on 9 September 2022 to extend the consent duration relating to the display of general advertising signage on the Glebe Island Silos for a further three (3) year term. No other change to the development is sought by this Modification Application.

The SEE has been prepared by Urban Concepts on behalf of the Applicant, Eye Drive Sydney Pty Ltd a subsidiary company of oOh!media Limited (hereafter referred to as oOh!media). The site is owned by the Port Authority of NSW (hereafter referred to as the Port Authority). The Port Authority has provided a letter granting owners consent for the lodgement of this Section 4.55(2) Modification Application. This letter is submitted under separate cover.

Pursuant to the provisions of Clause 2.8(4) of State Environmental Planning Policy (Precincts - Eastern Harbour City) 2021 (Precincts SEPP 2021) the site is zoned Port and Employment. The NSW Minister for Planning and Public Spaces was the consent authority for the Development Consent and is the Consent Authority for the purposes of this Modification Application. This is because the Precincts SEPP 2021 identifies the Minister for Planning as the consent authority for developments with a capital investment value of not more than \$10 million and which are located within the area identified as Glebe Island, White Bay and Rozelle Bay on the Sydney Harbour Port and Related Employment Lands Map (detailed in Figure 1.1) and which is carried out by a person other than a public authority (i.e. not the Port Authority). The Glebe Island Silos are located within the boundaries shown in Figure 1.1, the Application is being advanced by Eye Drive Sydney Pty Ltd and the capital investment value of the proposal is under \$10 million. Therefore, the Minister for Planning and Public Spaces is the consent authority for of this Modification Application.

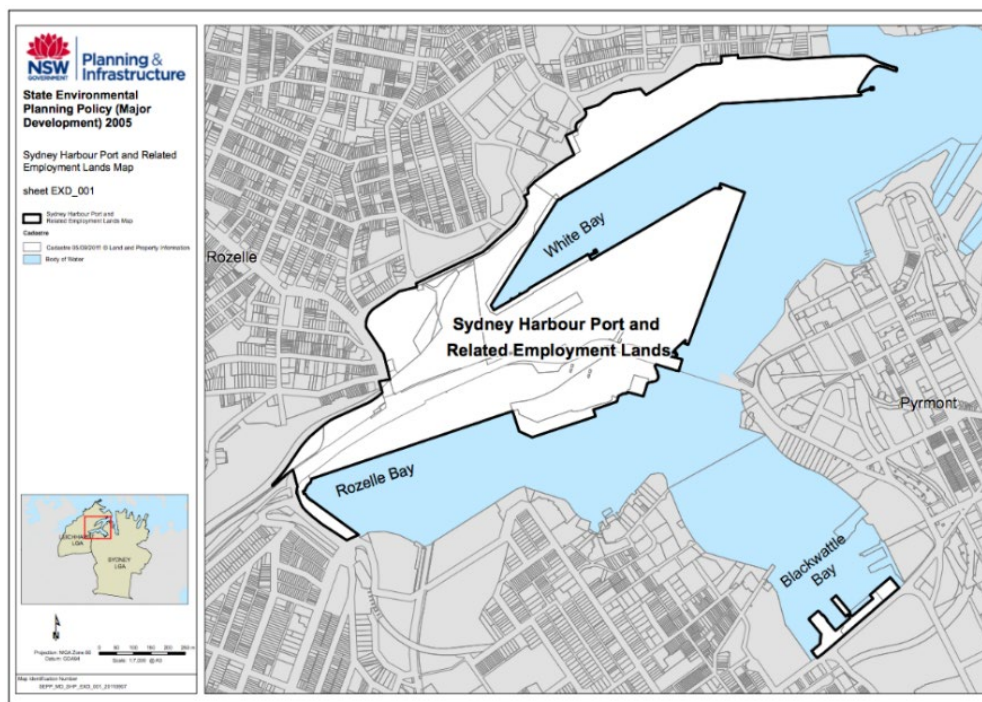
Signage has existed on the Glebe Island Silos for approximately 32 years and has been the subject of numerous Development and Modification Applications over that time. When originally constructed the signage was considerably larger covering the top of the eastern, western and southern elevations of the Silos. The signage, as approved under DA 21/13182 is located and covers the top of the southern and western elevations in accordance with the provisions of the Glebe Island Silos Development Control Plan 2004. Refer to Figures 1.2 and 1.3.

A copy of the consent instrument for DA 21/13182, being the consent that is being amended by this Modification Application is reproduced in Appendix A. As currently approved, the development has a duration of 3 years from 9 September 2022 (being the date the development consent was granted).

This Section 4.55(2) Modification seeks an extension to the consent duration to enable the existing externally illuminated advertising signs to be displayed for a further three (3) years. Legal advice prepared by Norton Rose Fullbright Australia that is reproduced in Appendix B and summarised in Section 5 of this report, confirms that the consent authority has the power to approve this Modification Application.

This SEE has been prepared to address the statutory requirements and the broader planning and environmental issues associated with the proposal as required under Section 4.55(2) of the Environmental Planning and Assessment Act, 1979 (NSW) (EP& A Act) including the matters for consideration under Section 4.15(1).

FIGURE 1.1 SYDNEY HARBOUR PORT AND RELATED EMPLOYMENT LANDS MAP



Source: Maps - State Environmental Planning Policy (Precincts—Eastern Harbour City) 2021

FIGURE 1.2 EXISTING SIGNAGE ON THE SOUTHERN ELEVATION



Source: oOh!media

FIGURE 1.3 EXISTING SIGNAGE ON THE WESTERN ELEVATION



Source: oOh!media

The SEE Report format comprises the following Sections:

- Section 1. This introduction including details of the development consent to be modified and the pre- application consultation that has been undertaken with the Department Planning Housing and Infrastructure (DPHI).
- Section 2. Examines the environmental context of the site including relevant considerations and extracts from the heritage, visual, lighting, traffic and ecological impact assessments that form part of the supporting documentation
- Section 3. Examines the strategic planning framework and the justification for the proposal. This includes an overview of the Bays West Place Strategy 2021 including the of the Bays West Precinct Stage 1 Master Plan and Rezoning 2022 and the Bays West Stage 1 Design Guide 2022 and strategic relevance to the Glebe Island Silos.
- Section 4. A description of the proposed Modification including the existing Public Benefit Agreement with the Inner West Council that will continue to deliver an annual monetary contribution to the Council to support local heritage initiatives within Rozelle and Balmain.
- Section 5. Discusses the requirements of Section 4.55(2) as they relate to the proposal and confirms the proposal satisfies the Section 4.55(2) substantially the same development test.
- Section 6. An Assessment of the proposed Modification pursuant to Section 4.15(1) of the EP&A Act.
- Section 7. Conclusion and Recommendation.

The SEE demonstrates that the proposal will not give rise to any adverse traffic and pedestrian safety, illumination, heritage, visual impact or ecological impacts. The proposal in our professional opinion is in the public interest and the existing development consent should be modified to allow for a three (3) year extension to the duration of the development consent.

1.1 Supporting Documentation

The Modification Application is accompanied by the following documentation, which should be read in conjunction with the SEE.

- Appendix A Development Consent DA21/13182 dated 9 September 2022.
- Appendix B Legal Advice from Norton Rose Fullbright Australia dated 14 February 2025.
- Appendix C Copy of Approved Plans prepared by Arcadis.
- Appendix D Pre-Application Meeting Minutes Department of Planning Housing and Infrastructure (DPHI) dated 30 July 2024.
- Appendix E Visual Impact Assessment Report prepared by Urbis dated 27 March 2025.
- Appendix F Heritage Impact Assessment Report prepared by NBRIS dated 13 March 2025.
- Appendix G Existing Public Benefit Agreement.
- Appendix H Lighting Impact Assessment Report Ref 3823 prepared by Electrolight Australia Pty Ltd dated 24 February 2025.
- Appendix I Traffic Impact Assessment Report Ref P6791.002R prepared by Bitzios Consulting dated 11 February 2025.
- Appendix J Ecological Impact Assessment Ref 22012RP1 prepared by Cumberland Ecology dated 21 February 2025.
- Appendix K Structural Certification prepared by Lewis Consulting Structural Engineers dated 27 May 2025

1.2 Development Consent History

Roof signage has existed on the Glebe Island Silos for 32 years. The development consent history is summarised below.

- **On 21 May 1992**, the then Minister for Planning granted development consent to an Olympic Games 2000 Mural and the provision for sponsor advertising and lighting on the Glebe Island Silos. The consent was limited to a 10 year period.
- **On 14 October 1992**, the consent was modified (R92/00081/001) by way of the deletion of a condition relating to the submission of advertisement details and specifications for the approval of the Director.
- **Between 2002 and 2005**, the advertising structures remained on the Silos whilst Eye Corp Pty Ltd consulted with the Department regarding a Development Control Plan (DCP) for advertising signage on the Glebe Island Silos. *The Glebe Island Silos Advertising Signage Development Control Plan* was adopted in December 2004, which included a requirement to limit the consent duration for the display of advertising signage to a three (3) year period.
- **On 30 August 2005**, the Sydney Harbour Foreshore Authority (SHFA) granted development consent to retain the previously approved signage with minor modifications. The consent was limited to a three (3) year period.
- **On 17 October 2008**, SHFA granted a further consent to retain the signage. This consent was also limited to a three (3) year period.
- **On 11 April 2012**, the Department approved a development application for a three (3) year temporary consent for the existing signage structure on the Glebe Island Silos (DA 041-09-2011).
- **On 12 February 2016**, the Planning Assessment Commission approved a Section 4.55(2) Modification Application (DA 041-09-2011 MOD 1) to extend the display of advertising signage for an additional three (3) years.

- **On 21 September 2018**, the Department approved a Section 4.55(2) Modification Application (DA 041-09-2011 MOD 2) to extend the display of advertising signage by four (4) years, which lapsed on 11 April 2022. Conditions imposed included a 1am curfew for the illumination of the signage at night and a public benefit offer to the Inner West Council implemented under a Planning Agreement. This agreement delivered to the Inner West Council an annual monetary contribution.
- **On 9 September 2022**, the Independent Planning Commission (IPC) as delegate to the Minister of Planning granted consent to DA21/13182 permitting the signage for a three (3) year term, commencing from 9 September 2022. A condition of this consent prevents the illumination of the signage between 11pm and 6am Monday to Sunday. This Development Application was accompanied by a Public Benefit Agreement that delivered to the Inner West Council an annual monetary contribution for heritage conservation in the LGA. Further details are provided in Section 3.5 of the SEE. A copy of Development Consent DA21/13182 is reproduced in Appendix A. A copy of the existing Public Benefit Agreement is provided at Appendix G.

1.3 Conditions To Be Modified

This Modification Application seeks to modify DA 21/13182. Specifically, this application seeks to modify the Terms of the Consent - Condition A2, Prevailing Documentation - Condition A4 and the Duration of the Consent – Condition A5. The new wording for these conditions is set out below in bold and changes are identified in red writing.

A2 UPDATED TECHNICAL REPORTS

Design Drawings by Arcadia			
Drawing No.	Issue	Name of Plan	Date
DA.01	1	Existing Signage Elevations and Details	30/06/21

Technical Report	Reference	Author	Date
Statement of Environmental Effects		Urban Concepts (on behalf of Eye Drive Sydney Pty Ltd (a subsidiary company of oOh!media))	27 August 2021 March 2025
Response to Submissions		Urban Concepts (on behalf of Eye Drive Sydney Pty Ltd (a subsidiary company of oOh!media))	18 March 2021
Sign Traffic Safety Assessment	P5182 P6791.002R	Bitzios Consulting	22 June 2021 11 February 2025
Letter of Public Benefit		Eye Drive Sydney Pty Ltd (a subsidiary company of oOh!media)	25 May 2021
Lighting Consultant Advice Letter Lighting Impact Assessment	Rev 1 Ref2823	Electrolight Australia Pty Ltd	3 December 2021 24 February 2025
Light Measurement Report		Electrolight Australia Pty Ltd	16 March 2022
Statement of Heritage Impact		NBRS & Partners Pty Ltd	26 June 2022 13 March 2025
Response to Submissions		NBRS & Partners Pty Ltd	18 March 2022

Ecological Assessment Report	Cumberland Ecology	19 February 2022 21 February 2025
Visual Impact Assessment	Urbis	March 2022 27 March 2025

A4 AMENDMENTS

A4. The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in Condition A2 ~~Error! Reference source not found~~ In the event of an inconsistency, ambiguity or conflict between any of the documents listed in Condition A2 ~~Error! Reference source not found~~ the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.

A5 AMENDMENTS

A5. This development consent is issued for a limited period of ~~three~~ **six** years. The consent will cease to be in force/expire ~~three~~ **six** years after the date of consent.

1.4 Pre Application Consultation

To facilitate the preparation of the Modification Application and to ensure that it thoroughly addressed any matters of concern to the DPHI a pre-application meeting was held on 30 July 2024. The Port Authority representative attended the meeting as the owner of the site. The minutes from the meeting are reproduced in Appendix D and the comments that are relevant to this Section 4.55(2) Modification Application are summarised in Table 1.1. The meeting participants are detailed below.

Attendees:

- Mary Garland (DPHI).
- Glenn Snow (DPHI).
- Cameron Sargent (DPHI).
- Lucinda Craig (DPHI).
- Ryan Bennett, Port Authority (PA).
- Anita Burgermeister, oOh!media (oOh!).
- Belinda Barnett, Urban Concepts (UC).

TABLE 1.1 MINUTES OF PRE APPLICATION MEETING

Authority	Matters Raised by the DPHI	Applicants Response
NSW DPHI	Timing of the Application. It was suggested that the Application be lodged once the strategic context of Glebe Island is finalised by the NSW Government	Condition A5 of the Development Consent limits the duration of the consent until 8 September 2025. The lodgement of this Modification Application is therefore driven by the duration of the existing Development Consent. Therefore, the Application needs to be lodged to enable the lawful continuing use of the advertising signage. The Bays West Place Strategy 2021 has been finalised and adjacent lands in Stage 1 of the Precinct have been master planned and rezoned. The strategic context of the site and adjacent land is evident. The Strategic Planning Framework of Bays West and the justification for the Modification is examined in Section 3 of the SEE.
	The Application will need to address the new land use scenario envisaged for the Bays Precinct by the NSW Government and provide justification as to why the signage is still appropriate	It is evident that there will be no new residential land use (now approved under the Bays West Stage 1 Rezoning and Master Plan package) in the vicinity of the site in the next three (3) years. This likelihood was acknowledged by DPHI Officers. Specifically in relation to lighting impact, it has been concluded by Electrolight in the submitted LIA that the signage can remain unchanged even if development was to occur in Site B of the Sub-Precinct 1 (Southern Development) which lies directly to the Southwest of the site. Refer to Appendix H.
	Discussion on the most appropriate planning pathway. A Development Application was suggested by the DPHI.	Legal advice confirms the use of a Section 4.55(2) Modification Application and that the proposal satisfies the substantially the same development test. This advice is reproduced in Appendix B. This advice was provided to the DPHI post the meeting and it was agreed that a s.4.55(2) Modification Application was the most appropriate statutory pathway.
	The Application will need to address the structural soundness of the signage structure to demonstrate that it complies with all relevant standards.	Lewis Consulting Structural Engineers has produced a structural certification report. It has concluded that both signs are structurally adequate and compliant with the relevant Australian standards. The full report is attached at Appendix K.
	The site falls under the Biodiversity and Conservation SEPP. A report is required to address the relevant provisions of the Biodiversity and Conservation Act 2016 (BC Act). Specifically, the Ecological Assessment Report must include reference to	An Ecology Assessment Report (EAR) has been prepared by Cumberland Ecology and forms part of the Modification Application. The report is reproduced in full including all Appendices at Appendix J. The EAR deals with requirements as outlined by the DPHI.

Section 7.2 and 7.3 of the BC Act.

It is also noted that the DPHI acknowledges that there is no vegetation on top of the Silos, and it is assumed that there are no threatened species. Notwithstanding this assumption, the Modification Application Report will need to state that the proposal will not significantly affect threatened species and why.

The EAR confirms that:

'Assessments have been conducted in accordance with the requirements of Section 7.2 and Section 7.3 of the BC Act and have confirmed that the project does not occur in an Area of Outstanding Biodiversity Value nor does it trigger any of the BOS thresholds.

Tests of Significance in accordance with Section 7.3 of the BC Act have been completed for the Grey-headed Flying-fox, owl species and microchiropteran bats that have been recorded for the locality, and these indicate that the signage is unlikely to have a significant impact on these species. As the MA does not trigger entry into the BOS and will not result in any increases to impacts on biodiversity values compared to the current existing approvals, a BDAR is not required to accompany the MA'

Source: Compiled by Urban Concepts 2025

2. SITE DESCRIPTION AND ENVIRONMENTAL CONTEXT

2.1 Introduction

This Section presents a description of the site and its surrounding locality. It includes the findings from the specialist environmental investigations into traffic safety, visual impact, heritage, ecology and lighting that have been commissioned by the Applicant to support this Modification Application.

2.2 Site Description

The subject site is commonly referred to as the Glebe Island Silos and is located at Sommerville Road, Glebe Island. The site is located within the Inner West Local Government Area. The site forms part of the Glebe Island Port. Glebe Island is a reclaimed peninsula to the south of Balmain and is surrounded by water to the north (White Bay) south (Rozelle Bay) and east (Johnstons Bay). Anzac Bridge and the City West Link are situated to the south and southwest of Glebe Island respectively. Refer to the Location Plan in Figure 2.1.

The site is legally described as Lot 11 in DP1288503 and Lot 13 in DP11707, being the lots over which Eye Drive Sydney has a lease. The site is under the care, control and ownership of the Port Authority of NSW. Glebe Island is a working port used for deep water wharfage and storage including bulk cement, sugar, gypsum loading and unloading. Glebe Island and White Bay are the only deep-water wharves west of the Sydney Harbour Bridge. Public access to Glebe Island and White Bay is generally restricted and controlled with some public access available in certain areas. There is no public access to the Glebe Island Silos.

The Glebe Island Silos structure is a significant landmark. It comprises thirty (30) silos bound together in two parallel rows of fifteen (15) silos. The structure is rectangular in shape and is approximately 22 metres wide, 180 metres long and 50 metres high. The Silos have historically been used for the bulk handling of wheat and are currently used for the storage of sugar and cement. The Silos are constructed in concrete and built as one element. The tower and conveyor room are clad in metal sheeting fixed to a steel frame. The Glebe Island Silos comprise the following components:

- An enclosed conveyor arm extending from a motor room at the wharf edge to the upper north-eastern corner of the building;
- A machinery tower at the eastern end that rises from the ground to above the level of the adjacent Silos; and a
- A historical conveyor room which distributes the cargo to the selected silo.

The southern and western facades of the Silos are decorated with large scale murals depicting classical athletes competing in various Olympic sports. These murals were created in 1992 as part of the 'Olympic Look' program that was staged for the 2000 Sydney Olympic bid.

2.2.1 Description of Advertising Structure

Advertising signage is mounted on the upper parapet of the southern and western elevations of the Glebe Island. A gantry forms part of the advertising structure and is used for maintaining the signage and for changing the advertising copy. The signage has been approved as roof signage under DA 21/13182.

The advertising panels on the western elevation measure 22.1 metres x 6.1 metres which equates to a total advertising area of 134.8 square metres. On the southern elevation the advertising panel consists of three (3) panels measuring 61.7 metres x 6.1 metres, 61 metres x 6.1 metres and 51 metres x 6.1 metres which equates to a total advertising display area of 1037 square meters. The advertising panels comprise of vinyl skins which are printed with advertising copy and tensioned across the steel support frame. Each signage panel is externally illuminated using top mounted down lights. Six (6) equally spaced down lights are mounted on the western sign and forty-three (43) equally spaced down lights illuminate the southern sign. Generally, advertising copy is displayed on the Silos for twenty eight days before it is changed to a new campaign. Given the dimensions of the sign the copy is purpose-designed for its location.

The signage on the southern elevation is orientated to westbound traffic (away from the CBD) travelling over the Anzac Bridge. The signage on the western elevation faces eastbound traffic (towards the CBD) travelling along the City West Link. The signage is the subject of a commercial lease agreement between Eye Drive Sydney Pty Ltd and the Port Authority.

The following figures and captions describe the Glebe Island Silo Structure. Refer Figures 2.1-2.5.

FIGURE 2.1 SITE LOCATION SHOWING THE GLEBE ISLAND SILOS CIRCLED IN RED



Source: NSW Land & Property Information, Six Maps 2025

FIGURE 2.2

VIEW NORTH FROM SOMMERVILLE ROAD SHOWING THE SOUTHERN ELEVATION OF THE GLEBE ISLAND GRAIN SILOS MURALS PAINTED ON THE CONCRETE SILOS DEPICTING CLASSICAL COLUMNS, OLYMPICS GAMES SPORTING MOTIFS AND SIGNAGE STRUCTURE AT THE TOP LEVEL. THERE ARE NO CHANGES PROPOSED TO THE EXISTING OLYMPIC MURALS.



Source: NBRS Architecture 2025

FIGURE 2.3

VIEW NORTHEAST FROM THE ANZAC BRIDGE SHARED PATH TO THE WEST ELEVATION OF THE GLEBE ISLAND GRAIN SILOS SHOWING THE MURALS PAINTED ON THE CONCRETE SILOS DEPICTING CLASSICAL COLUMNS, OLYMPICS GAMES SPORTING MOTIFS AND SIGNAGE STRUCTURE AT THE TOP LEVEL. THERE ARE NO CHANGES PROPOSED TO THE EXISTING OLYMPIC MURALS.



Source: NBRS Architecture 2025

FIGURE 2.4

VIEW EAST LOOKING FROM THE OVERPASS OVER THE WESTERN DISTRIBUTOR AND APPROACH TO THE ANZAC BRIDGE SHOWING THE WEST ELEVATION OF THE SILOS PAINTED AND ADVERTISING MOUNTED ON THE UPPER LEVEL.



Source: NBRS Architecture 2025

FIGURE 2.5

VIEW OF THE NORTHERN ELEVATION OF THE SILOS, FACING SOUTH FROM ROBERT STREET.



Source: Google Streetview, July 2024

2.3 Surrounding Land Use Character and Context

The surrounding land uses are described below and illustrated in Figures 2.6 to 2.8.

TO THE NORTH

- **Balmain and White Bay** - North of the Silos is White Bay and Balmain, these locations have views to the northern and eastern façades of the Silos. These elevations of the Silos do not have any signage, and these areas view the Silos in their original state.

TO THE WEST

- **The Bays Metro Station** – The Bays Metro Station is located between the Glebe Island Silos and White Bay Power Station. The Metro will provide rail connections to the Sydney CBD, Western Suburbs and Parramatta. Initial construction has started on the site, with a projected opening date of 2032.
- **Rozelle** - West of the Silos is the suburb of Rozelle, with a commercial and industrial corridor along Victoria Road and attached and medium density housing behind. Although the Silos are visible from some parts of Rozelle, most of the suburbs are screened from view by topography and built form.
- **Rozelle Parklands** – Opened in 2023, Rozelle Parklands are located southwest of the Silos. The new multi-purpose open space includes a wetland, boardwalk, picnic areas, barbeques, playgrounds, bush trails and a Village Green. The Parklands have pedestrian and bicycle shared user paths and bridges that provide connection to active transport links around Lilyfield, Annandale, Rozelle, Victoria Road, Anzac Bridge, Iron Cove, and beyond.
- **White Bay Power Station** – The White Bay Power Station is located directly west to the Silos. The site is a heritage listed former coal-fired power station which historically powered Sydney's tram system and later its rail network until it was decommissioned in 1984. The station has recently been restored and serves as a cultural and community hub for the future Bays West Precinct.

TO THE SOUTH

- **Anzac Bridge** - The Anzac Bridge runs adjacent to the Silos to the south and is in an elevated position as it passes the Silos.
- **Glebe Island** - Glebe Island is predominantly characterised by large scale maritime industrial buildings and open hardstand that is used for port activities with supporting infrastructure and access roads. In 2017, the NSW Government recommended that Port facilities at Glebe Island be retained and expanded to meet the strategic supply needs of the construction industry.

The land immediately to the south of the Silos forms part of Glebe Island Berths 1 and 2, is generally open hardstand that is devoid of any large built form structures. Approval under Part 5 of the EP&A Act 1979 exists for the ongoing use of Berths 1 and 2 for ad hoc port related activities. Hanson Construction Materials Pty Ltd has received approval for an aggregate handling facility and concrete batching plant under State Significant Development Application SSD 8544. A significant part of the remaining area of Glebe Island is being used to support the State significant Approval to support the Western Harbour Tunnel and Warringah Freeway Upgrade Project (SSI8863).

- **Rozelle Bay and Blackwattle Bay** - Further to the south lie Rozelle Bay and Blackwattle Bay. A foreshore path provides public access along the south and southwest of the Rozelle Bay and Blackwattle Bay Peninsula.

- **Glebe** - To the south, the suburb of Glebe is dominated by a mix of attached and detached housing and low to medium rise residential developments. A foreshore path provides public access along the harbour edge and links several parks.
- **Annandale** - South-west of the Silos and bounded by Johnstons Creek, Rozelle Bay and the City-West Link Road is the suburb of Annandale, which is dominated primarily by attached housing. These areas experience filtered views of the signage.

TO THE EAST

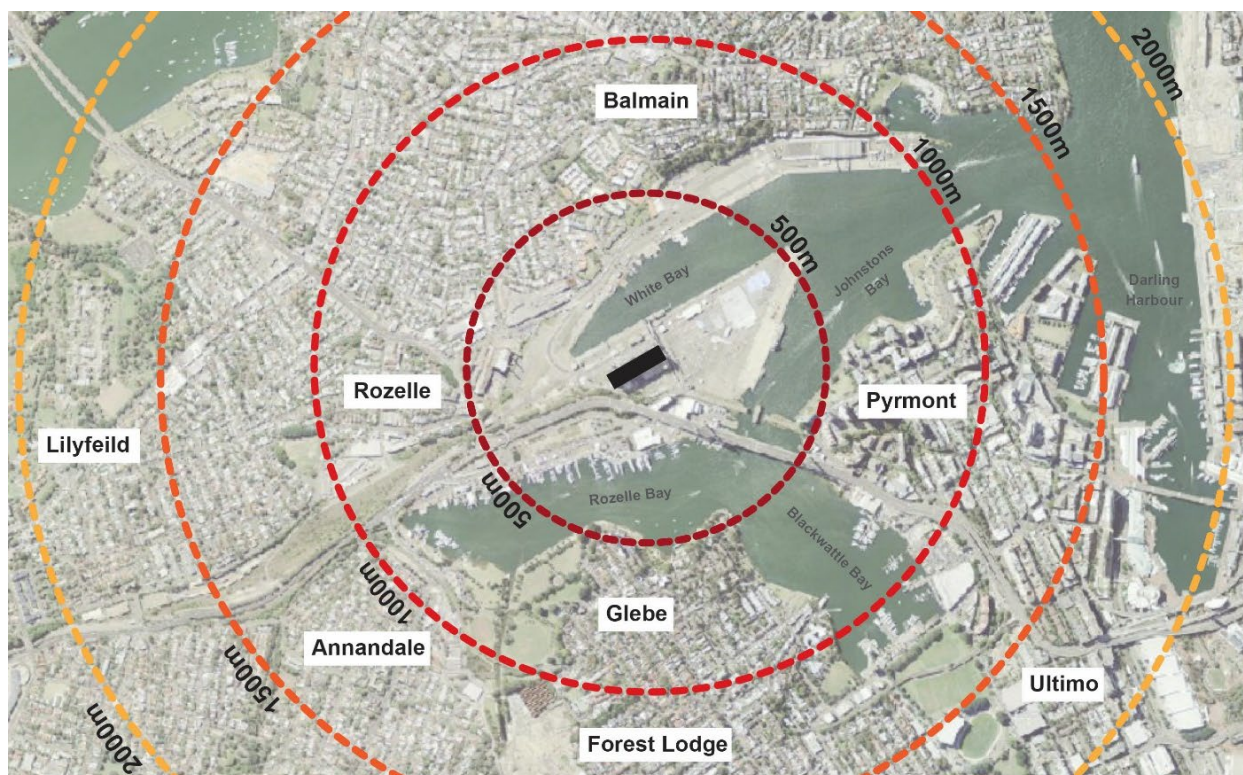
- **Pyrmont** - The Peninsula to the east and south-east of the Silos accommodates the suburb of Pyrmont. It is characterised primarily by high density residential development. A public footpath is provided along the water's edge north of the old Glebe Island Bridge, but public access is limited by private landholdings along the foreshore of Blackwattle Bay. The eastern elevation of the Silos is devoid of signage and as such this area views the Silos in their original state.

FIGURE 2.6 THE SURROUNDING LAND USE CONTEXT OF THE SILOS



Source: Urbis VIA 2025

FIGURE 2.7 THE SURROUNDING LAND USE CONTEXT DISTANCES



Source: Urban Concepts 2025

FIGURE 2.8 ROZELLE PARKLANDS



Source: NSW Government 2023

2.4 Strategic Land Use Context

As discussed in Section 4 of this report, the Glebe Island Silos form part of the land that has been designated by the NSW State Government as the Bays West Precinct. The Precinct comprises 5.5 kilometres of harbour front, 95 hectares of mostly Government owned land and 94 hectares of waterways in Sydney Harbour. In Section 3 of this SEE we examine the strategic plans that will guide the transformation of the Precinct and the future land use context of the Glebe Island Silos.

2.5 Existing Local Road Network

Bitzios Consulting has undertaken a Traffic Safety Assessment (TSA) to support this Modification Application. The Bitzios TSA Report is reproduced in Appendix I. The relevant extracts from the report that define the local road network are reproduced below.

The local road network of relevance to this project and the location of the existing signage is illustrated by Figure 2.9

The TSA Report acknowledges the transport and movement challenges that exist within the road network as detailed in the following extract.

FIGURE 2.9 LOCAL ROAD NETWORK AND LOCATION OF THE EXISTING SIGNAGE



Access to and from Bays West is constrained, with surrounding roads acting as a barrier to and from the precinct, compounded by remnant topography and the reclaimed flat deck. Many of the access roads are already operating at capacity. Key Transport and Movement challenges identified in the Place Strategy include:

- *It is currently an isolated precinct with limited connectivity between the Sydney CBD/Pymont and Balmain/Rozelle*
- *Public transport in surrounding areas is experiencing high demand*
- *Traditional travel patterns for an evolving precinct including high private vehicle use cannot be supported*
- *Water, topography and arterial roads act as barriers to unlock access at site edges and within the precinct*
- *Constraints exist on permitted access points to the precinct for vehicles*
- *Providing ongoing staged use of existing roads for ports and maritime uses, and long-term heavy vehicle impacts on overall place quality, heritage and culture.*

2.6 Visual Character

Urbis has undertaken a Visual Impact Assessment (VIA) to understand the visual character and context of the approved development and to determine the visual impacts in relation to the continuing use of the signage. The VIA report assesses the potential impacts of a continuation of the existing use of the signage in-situ on the Glebe Island Silos (the site). The report builds upon the knowledge of the site, visual analysis, observations and conclusions drawn by Urbis in relation to the existing development consent. These findings are discussed in this Sub-Section. Views of the site have been documented from a range of places during the day and night and provide a representative sample of public and private domain comparisons. The visual catchment of the Silos is illustrated at Figure 2.7.

The methodology employed by Urbis to assess visual impacts is based on a combination of established methods used in NSW. The VIA is reproduced in Appendix E. The results of the VIA are summarised in Section 6 of this report.

2.6.1 Visual Character of the Site

The following extract has been reproduced from the Urbis VIA and describes the visual character of the site.

Visual character is determined by the predominant visual features that are present in a view or across a site. In this case the site is occupied wholly by the existing 30 silos arranged in two rows of 15, which are tall, individual vertical structures, adjoined to form a double row approximately 180 metres long. The combined structures form a visual wall 22 metres wide and 50 metres high which combined give the appearance of a long horizontal built form.

The silos are visually isolated from other heritage features for example the White Bay Power Station which stands approximately 330 metres to the north-west and the ANZAC Bridge Piers and structures. The Silos are immediately surrounded by a low linear shed structure to the north, miscellaneous low built forms, open areas of hard standing and former carparking areas, tall poles and flood lights defined by constructed sea walls. In other words other than the heritage item itself, the immediate visual context and visual character of the site is of low scenic quality and includes a variety of built forms and features that are vernacular to former wharfs and industrial settings.

The Silos are listed as a local heritage item under the Schedule 4 of State Environmental Planning Policy (Precincts - Eastern Harbour City) 2021 and are still operational are used for storage and handling of sugar and cement. The southern and western façades of the Silos are decorated with large murals depicting athletes competing in various Olympic sports. These murals were created in 1992 as part of the 'Olympic Look' program that was staged for the 2000 Sydney Olympic bid.

Advertising signage is mounted on the upper parapet of the southern and western elevations of the Silos group. A gantry forms part of the advertising structure and is used for maintaining the signage. The advertising panels on the western elevation measure 22.1m x 6.1m (134.8sqm advertising display area). On the southern elevation there are three panels which equate to a total advertising display area of 1,037sqm.

2.6.2 Visual Character of the Surrounding Context

The visual character of the surrounding context or visual setting of the site is determined by the surrounding development including transport infrastructure (both road networks and public transport systems) and open spaces. The following extract has been reproduced from the Urbis VIA and details the visual character of the surrounding land use context.

Immediately north of Glebe Island are the berths and hardstand area of White Bay. This is operational port and working harbour land used for a variety of purposes including vessel loading/unloading, repairs, lay-ups, working harbour contractors, construction support. White Bay is also the location of the White Bay Cruise Terminal. Further north is the suburb of Balmain, which is predominantly characterised by low density attached housing with some older style walk up apartment buildings. Blackwattle Bay is located immediately south of Glebe Island and the suburb of Glebe is further south. The area of Glebe around Blackwattle Bay includes a mix of attached and detached houses, and residential flat buildings of up to three to four storeys. A public walking path is located along the foreshore and provides views of Blackwattle Bay and the ANZAC Bridge. Maritime businesses and industries occupy southern parts of Rozelle Bay.

Immediately east of Glebe Island is the ANZAC Bridge. Further east, across Johnstons Bay, is the suburb of Pyrmont. The western part of Pyrmont closest to Glebe Island is characterised by newer high density residential development. A public walking path is located along the Jones Bay foreshore which provides links to several public open spaces and offers views of Jones Bay and Glebe Island.

White Bay Power Station is located to the west of Glebe Island. The suburbs of Rozelle and Lilyfield are located further west. The newly constructed Rozelle Parklands extend in a linear fashion from Victoria Road (east) to approximately in line with Cecily Street (west), separating areas of residential development north of Lilyfield Road from the City West Link and ANZAC Bridge on-ramp. The parklands include playing fields, pedestrian walkways, playgrounds and amenities blocks and have expansive views towards the Sydney CBD. The south-western edge of the parklands is visually characterised by three tall exhaust stacks connected by an external skeleton. Pedestrian paths pass underneath the exhaust stacks and connect to the newly constructed pedestrian bridge which provides access over the City West Link, between the parklands and Rozelle Bay Light Rail Stop.

2.6.3 Future Visual Character of the Site and Surrounding Context

The Urbis VIA examines the future visual character of the site and the surrounding context having regard to the desired outcomes envisaged for the site and the adjacent locality under the recently finalised Bays West Stage 1 Master Plan and Rezoning 2022. The following extract has been reproduced from the VIA.

The endorsed future desired character outlined in the Bays West Place Strategy indicates that land use changes will occur within the western precincts surrounding the proposed Metro station between now and 2030. Therefore, the composition of views to the Silos and signage from parts of the visual catchment to the west, south-west and south will include the new land uses (and associated construction activities) including mixed-use development, higher density and high rise buildings (likely concentrated to the west of the Silos and closer to the ANZAC Bridge approach / City West Link) and open space being planned for the White Bay Power Station (and Metro) sub-precinct.

The Strategy and resultant Bays West Structure Plan (the Plan) includes the retention and adaptive reuse of heritage assets, such as the White Bay Power Station and Glebe Island Bridge, and the retention of existing uses or potential adaptive reuse of the Glebe Island Silos.

We note that the Bays West Precinct has been subject to constant visual change over the last century where the largest and most visible of the precinct's industrial structures the White Bay Power Station (constructed 1917), power station stage 2 (constructed 1928), coal export loading facilities (constructed between 1945-1965) and construction of the Glebe Island Silos (1970's) have all created visual change and contributed to the areas 'industrial scale' visual character.

In this regard, the visual context and character of the wider Bays Precinct has been subject of significant, continual and cumulative visual change to form today's visual setting that is widely accepted as being unique and worthy of retention. Stages of development proposed in the Strategy including up to and beyond 2030 endorse further and ongoing transformational visual change for the wider the Bays West Precinct and wider Bays Precinct.

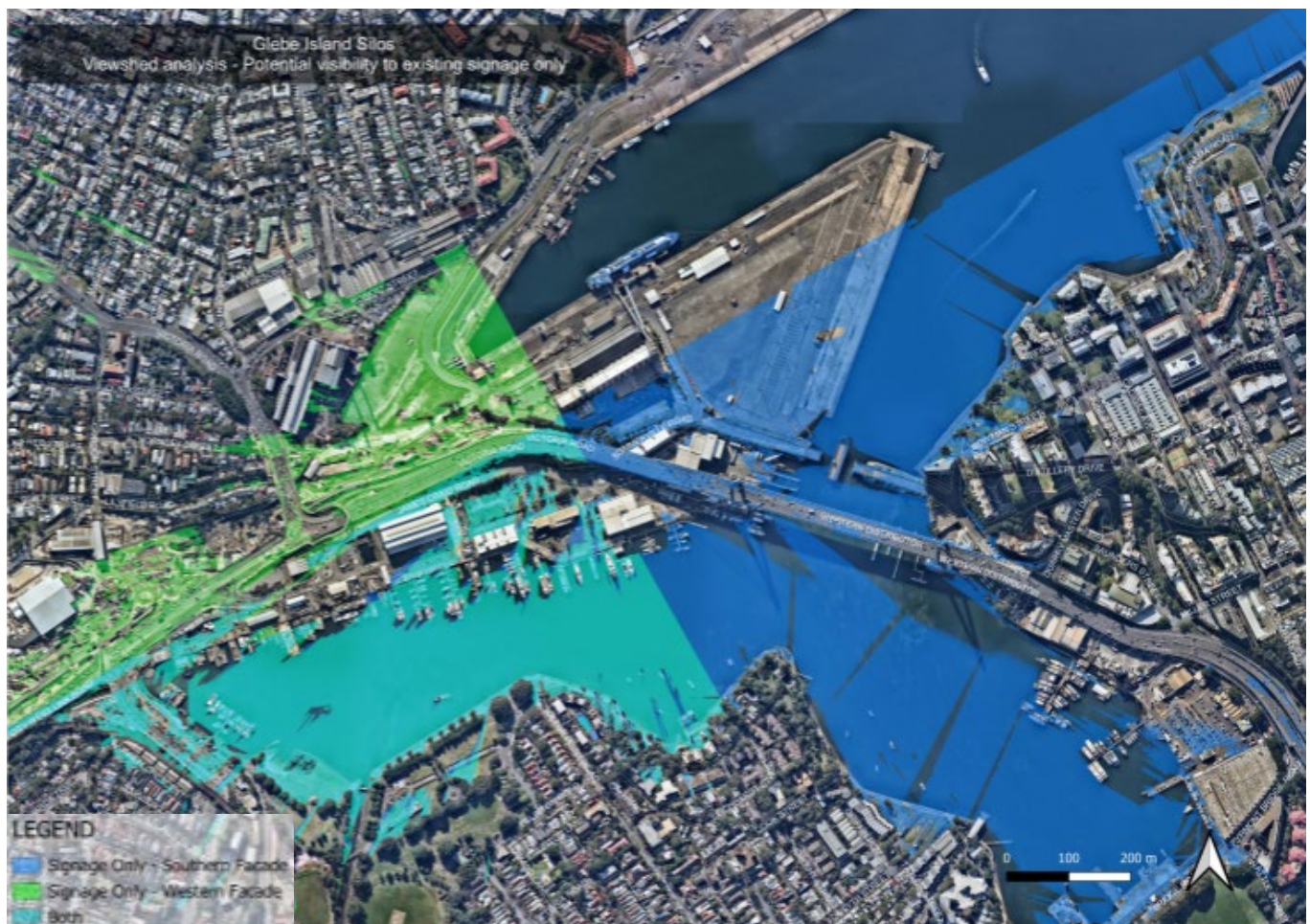
2.6.4 Visual Catchment

The visual catchment is the theoretical area within which a site or development may be visible. In this case, the potential and actual visual catchment will not change in relation to the proposed Modification.

Urbis has determined the potential visual catchment of the signage via a desktop review of the site using 3D aerial imagery, maps and client supplied information. Fieldwork observations and LiDar data across the potential visual catchment have been used to determine the extent of external visibility of the existing and proposed built forms on the site, from surrounding development. LiDar data refers to Light Detection and Ranging which is technology used to create high-resolution models of the ground levels and underlying topography. In this case to predict the potential visual catchment Urbis used the relative levels (RLs) of the proposed forms and mapped the heights of surrounding intervening-built form, within 1 km of the site to be able to predict the external visibility of the upper storeys the towers.

The map in Figure 2.10 shows the range of visibility in relation to the signage only (rather than the Silos structure) and considers the extent of visibility relative to the southern facade (dark blue) and western facade (green) both individually and together (light blue). All three colours combined are representative of the total potential visibility to any part of the signage, noting that views which include both elevations of the sign are limited to the light blue Section only.

FIGURE 2.10 VIEWSHED ANALYSIS

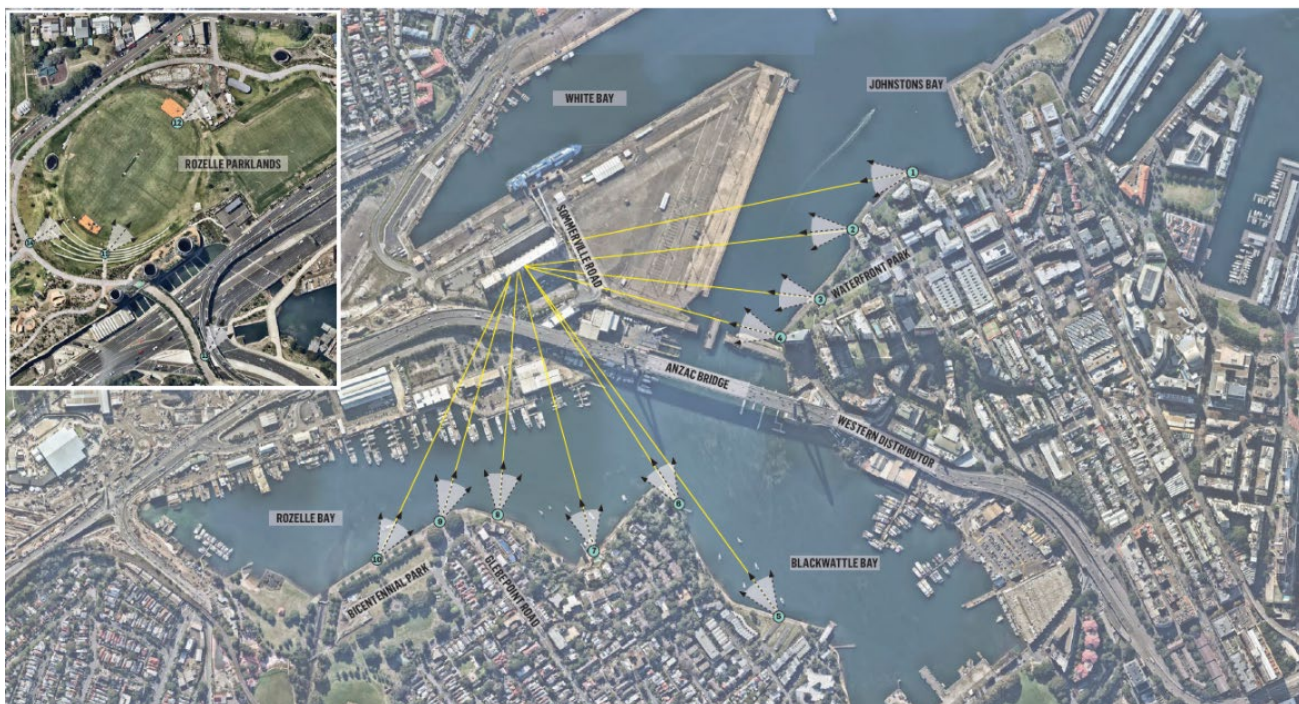


Source: Urbis VIA 2025

2.6.5 View Impact Locations

The Urbis VIA details the existing composition and the existing visual effects across fourteen (14) key viewpoint. The viewpoints are identified in Figure 2.11 and are listed in Table 2.2. The VIA which is in Appendix E of this SEE provides a Visual Effects Analysis and contains a detailed assessment of each view location. A summary of the VIA findings is detailed in Section 6 of this SEE.

FIGURE 2.11 VIEWPOINTS



Source: Urbis VIA 2025

TABLE 2.2 DESCRIPTION OF VIEW LOCATION AND DAYTIME VIEW

URBIS VIEW NUMBER	LOCATION DESCRIPTION	DESCRIPTION OF DAYTIME VIEW
VIEW 01	VIEW WEST TOWARDS SITE FROM SEA WALL OF JONES BAY, PYRMONT	<i>This is a highly oblique north-westerly view to the Silo structure and existing signage. The foreground view composition is predominantly characterised by a wide expanse of open water in Johnstons Bay</i>
VIEW 02	VIEW WEST TO SUBJECT SITE ADJACENT TO RESIDENTIAL FLAT BUILDINGS AT 32 REFINERY DRIVE, PYRMONT	<i>This is an oblique north-westerly view to the Silos and existing sign.</i>
VIEW 03	VIEW WEST TO SUBJECT SITE FROM PUBLIC FORESHORE PATH,	<i>The composition of this view is similar to View 2 but is marginally closer and less oblique in comparison. It is from a centrally located water-side promenade within Waterfront Park</i>

	MIDWAY ALONG WATERFRONT PARK, PYRMONT	
VIEW 04	VIEW WEST TO SUBJECT SITE FROM PUBLIC FORESHORE PATH ADJACENT TO RFB AT 2 BOWMAN STREET	<i>This is a close and direct view to the majority of the south elevation of the Silos and existing signage from the end of the public foreshore path, close to the ANZAC Bridge. The composition includes Glebe Island Bridge and associated infrastructure included within the Ports facility such as tall light standards etc.</i>
VIEW 05	VIEW NORTH WEST TOWARDS SUBJECT SITE FROM FORESHORE PATH ADJACENT TO 3-27 GRIFFITH PLACE, GLEBE	<i>This view is representative of compositions available from the southern end of Blackwattle Bay and southern extent of the potential visual catchment</i>
VIEW 06	VIEW NORTH WEST TO SUBJECT SITE FROM BLACKWATTLE BAY WHARF GLEBE	<i>This view place is at low elevation compared to the existing signage, close to water level so that it represents a potential view available from a ferry or from Blackwattle Bay.</i>
VIEW 07	VIEW NORTH TO SITE ALONG PUBLIC FORESHORE PATH BETWEEN PRIVATE JETTY AND RESIDENTIAL BUILDINGS AT 18 OXLEY STREET, GLEBE	<i>This is a public pathway view north-east from the Blackwattle Bay approximately adjacent to 18b Oxley Street Glebe. This composition is representative of views that may be available from east-facing dwellings at 18b Oxley Street. The sign within its heritage Silos structure, occupies a central part of a wider view which extends to the north and south and is a local focal point and landmark. The wider view is characterised by an industrial and maritime visual setting. The existing signage does not protrude above or beyond the Silo's form, or dominate the height, form, and scale of the Silos</i>
VIEW 08	VIEW NORTH TO SUBJECT SITE ALONG PUBLIC FORESHORE PATH ADJACENT TO RESIDENTIAL BUILDING AT 463 GLEBE POINT	<i>This is a waterside public pathway view north-east from the north edge of Federal Park adjacent to Glebe Point. The west and south elevations of the site are visible above the foreground harbour and maritime setting and ANZAC Bridge. The sign within its heritage Silos structure occupies a central part of a wider view that extends to the north and south and is a local focal point and landmark. The existing signage does not protrude above or beyond the Silos or dominate its form, scale, or visual prominence or block access to views to any part of the heritage item or scenic features or compositions beyond the Silos.</i>

VIEW 09	VIEW NORTH EAST TO SUBJECT SITE ADJACENT TO FORESHORE STEPS FROM BICENTENNIAL PARK, GLEBE	<i>This is a waterside public pathway view north-east from the north-edge of Federal Park adjacent to Glebe Point. The west and south elevations of the site are visible above the foreground harbour and maritime setting and ANZAC Bridge. The sign within its heritage Silos structure occupies a central part of a wider view that extends to the north and south and is a local focal point and landmark. The existing signage does not protrude above or beyond the Silos or dominate its form, scale or visual prominence or block access to views to any part of the heritage item or scenic features or compositions beyond the Silos.</i>
VIEW 010	VIEW NORTH-EAST TO SILOS FROM BICENTENNIAL PARK SCULPTURE	<i>This is a waterside public pathway view north-east from the south-western area of Bicentennial Park. The west and south elevations of the site are visible above the foreground harbour and maritime setting, and ANZAC bridge. The sign, within its heritage Silos structure, occupies a central part of an expansive view available that extends northeast and north-west. The existing signage does not protrude above or beyond the Silos, or dominate its form, scale or visual prominence. It does not block access to any part of the heritage item, or scenic features and compositions beyond the Silos. In our opinion, the existing signage appears to be visually integrated as part of the Silo's structure where the column artwork and shading effects support the horizontal form display space.</i>
VIEW 011	VIEW NORTH-EAST TOWARDS SITE FROM ROZELLE PARKLANDS	<i>The existing signage is of low visibility and does not block access to views to any part of the heritage item or scenic features or compositions beyond the Silos. In our opinion, the existing signage appears to be visually integrated as part of the Silo's structure where the columnar artwork and shading effects support the horizontal form display space.</i>
VIEW 012	VIEW TOWARDS SITE FROM NORTH-EASTERN EDGE OF CENTRAL OVAL, ROZELLE PARKLANDS	<i>The Silos structure and western elevation of the signage occupies a central location within the mid-ground composition. The existing signage does not protrude above or beyond the Silo's form or dominate the height, form, and scale of the Silos including roof structures and telecommunications equipment. The</i>

		<p>existing signage does not block access to views to any part of the heritage item or scenic features or compositions beyond the Silos. In our opinion, the existing signage appears to be visually integrated as part of Silo's structure where the columnar artwork and shading effects support the horizontal display space.</p>
VIEW 013	VIEW TOWARDS SITE FROM PEDESTRIAN BRIDGE BETWEEN ROZELLE PARKLANDS & ROZELLE BAY LIGHT RAIL STOP	<p>This view is representative of views north-east towards the site from the pedestrian bridge over the A4/M4 motorway between Rozelle Parklands and Rozelle Bay Light Rail (Railway Parade). The existing signage does not protrude above or beyond the Silo's form or dominate the height, form, and scale of the Silos including roof structures and telecommunications equipment. The existing signage does not block access to views to any part of the heritage item or scenic features or compositions beyond the Silos. In our opinion, the existing signage appears to be visually integrated as part of the Silo's structure where the columnar artwork and shading effects support the horizontal form display space.</p>
VIEW 014	VIEW NORTH-EAST TOWARDS SITE FROM WESTERN EDGE OF OVAL (ROZELLE PARKLANDS)	<p>This view is representative of compositions available from the western edge of the sports oval within Rozelle Parklands and is indicative of views from the western-most extent of the potential visual catchment. The foreground composition is characterised by juvenile trees, terraced concrete seating and the rectangular playing field to the north-east.</p> <p>The existing signage does not protrude above or beyond the Silo's form or dominate the height, form, and scale of the Silos including roof structures and telecommunications equipment. The existing signage does not block access to views to any part of the heritage item or scenic features or compositions beyond the Silos. In our opinion, the existing signage appears to be visually integrated as part of the Silo's structure where the columnar artwork and shading effects support the horizontal form display space.</p>

Source: Section 06 of the VIA prepared by Urbis 2025

2.6.6 Additional Factors Considered in the Visual Impact Assessment

In addition to the Visual Character Assessment, Urbis also considered several additional factors as part of the baseline research to determine the effects and visual impacts of the proposal. These include:

- Visual clutter and pollution.
- Viewing period.
- Viewing distance.
- Scenic quality.
- View place sensitivity.
- Potential private domain impacts.

This body of works is referenced in Section 05 Relevant Additional Factors of the Urbis VIA which is reproduced in Appendix E.

A summary of the key points raised by Urbis in the VIA follows.

- *The existing signage has been in-situ for over 30 years. The visual clutter is rated as low.*
- *The majority of views from close locations to the proposed development will be from moving viewing locations, or those of a short duration.*
- *Most public and private domain locations with views to the site are between 500m and 800m away. These are considered as being of a medium distance range (close range = <100m, medium range = 100-1,000m, and distant = >1,000m).*
- *Scenic quality is rated as medium. In our opinion, the scenic quality of the Silos within its industrial, maritime setting is medium. Extending the existing presence of the of the signage creates a neutral effect on the existing scenic quality of the Silos setting.*
- *Public domain view place sensitivity is considered high as the signage is visible from a large number of well-used public space locations along the Pyrmont and Glebe foreshore, and from the various water bodies within the Bays Precinct (Johnstons Bay, Rozelle Bay and Blackwattle Bay).*
- *Potential Private Domain View Place Sensitivity, Assessment: Low –medium.*
- *Potential Private Domain Impacts:*
 - *East - No additional visual change to day or night views will occur in potential private domain Views.*
 - *South - The proposed development will not change the existing day or night composition.*
 - *South-east - The location and orientation of the townhouses is such that is unlikely that any views to the north (north-north-west) towards the Silos and signs are available from any internal rooms.*

2.7 Heritage Significance

The Glebe Island Silos are identified as a local heritage item in Schedule 4 of the Precincts SEPP 2021 and are also identified as a heritage item on the Port Authority of NSW Section 170 register. The Silos are also within proximity to White Bay Power Station (SHR Listing No: 01015), Glebe Island Bridge (SHR Listing No: 01914), Glebe Island World War II Monument (SHR Listing No: 4560012), Glebe Island Plaque - Opening of Container Terminal (SHR Listing No: 4560013), Glebe Island Sandstone Quarry Sample (SHR Listing No: 4560014) and Glebe Island Dyke Exposures (SHR Listing No: 4560056). Given the heritage status of the Silos and its locational context adjacent to State heritage listed sites, a Heritage Impact Statement (HIS) has been prepared by NBRIS and is reproduced in Appendix F. In the following Subsections we detail the heritage listings that apply to the site and its environs together with a statement that is reproduced from the HIS that summarises the heritage significance of the Silos. A map of the heritage items referred to in the NBRIS HIS is provided at Figure 2.12.

2.7.1 Heritage Listings

The following extract for the NBRIS HIS details and explains the heritage listings are of relevance to this application.

The following statutory lists have been reviewed with respect to the following Local Government and State Agencies:

- *Glebe Island Wheat Silos are listed as an item of local significance on Schedule 4, Part 3 - Items in the Bays Precinct of the State Environmental Planning Policy (Precincts—Eastern Harbour City) 2021 as I1 – ‘Glebe Island wheat silos (components A, B and C as identified on Map 4)’.*
- *Glebe Island Silos are listed under Heritage Act - s.170 NSW State agency heritage register - Sydney Ports Corporation (Port Authority of NSW).*
- *Glebe Island Silos are not listed as a heritage item on the Leichhardt Local Environmental Plan 2013 (LLEP 2013), Schedule 5 Environmental Heritage; and*
- *Glebe Island Silos are not listed on the State Heritage Register (SHR) and do not have*
- *State heritage significance. Port Authority of NSW nominated the listing of the Glebe Island silos on the State Heritage Register (SHR) in June 2024; however, the Notice of Intention (NOI) to list this item was deferred in August 2024.*

The following heritage items, located in close proximity to the subject site, are listed on Schedule 4, Part 3 - Items in the Bays Precinct of the State Environmental Planning Policy (Precincts—Eastern Harbour City) 2021:

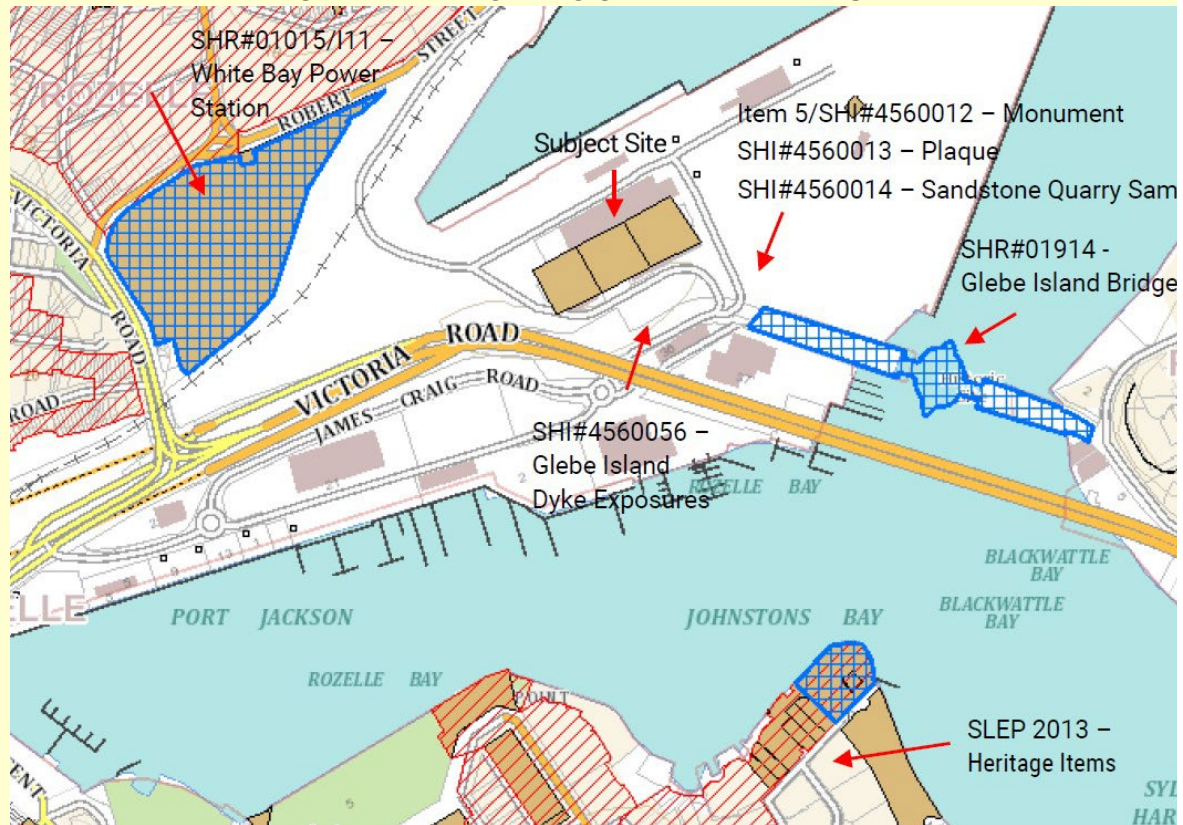
- *Item 5 – Monument, Glebe Island (Note: now located at the ‘Monument Lookout’ overlooking Glebe Island on Sommerville Rd);*
- *Item 11 – White Bay Power Station complex.*

The subject site is located in the vicinity of heritage items as listed on the State Heritage Register or listed on the Port Authority of NSW Section 170 Heritage and Conservation Register:

- *SHR#01015 – White Bay Power Station, Victoria Road, Rozelle;*
- *SHR#01914 – Glebe Island Bridge (RMS Bridge No. 61), Bank Street, Victoria Road, Pyrmont;*
- *SHR#4560012 – Glebe Island World War II Monument;*
- *SHR#4560013 – Glebe Island Plaque - Opening of Container Terminal;*
- *SHR#4560014 – Glebe Island Sandstone Quarry Sample; and*
- *SHR#4560056 – Glebe Island Dyke Exposures.*

The subject site is also located in the visual catchment of heritage items as identified on Schedule 5 of the Sydney Local Environmental Plan (LEP) 2012 and Inner West Local Environmental Plan (LEP) 2022.

FIGURE 2.12 EXCERPT FROM THE NSW PLANNING PORTAL SHOWING HERITAGE ITEMS IN THE VICINITY OF THE SUBJECT SITE INCLUDING HERITAGE ITEMS FROM THE STATE HERITAGE REGISTER HATCHED BLUE.



2.7.2 Heritage Significance of the Site

The following extract from the NBRIS HIS presents the Statement of Significance for the Glebe Island Silos, and is sourced from the NSW State Heritage Inventory, Heritage Item ID 4560016.

Glebe Island Grain Terminal is a seminal site in the development of the bulk wheat storage and export industry in Australia. As such it has a pre-eminent position in the historical development of one of Australia's most important primary industries. It was the first and most important of the port terminals and encompassed technologies that were specific to the industry and influential in the development of that industry throughout the country. The first construction phase is particularly noteworthy because of the circumstances of its wholly imported design and technological expertise.

The carefully planned and integrated system, by the 1930s, was considered to be one of the largest, most efficient and well-planned installations of its type. The fabric contained within the site, although compromised by alterations and missing elements is capable of demonstrating and recording the evolution of the industrial processes that evolved over several decades. The Silos, in particular, are the most visible and easily interpreted elements of that former use and form a powerful and well-known landmark. The site also has significance for its associations with, and demonstration of, Commonwealth and State government initiative.

2.7.3 Heritage Significance of Items in the Vicinity

The following extract from the NBRIS HIS details the heritage significance of the following items: It should be read in conjunction with Section 4, Heritage Management Framework from the NBRIS HIS Report:

- White Bay Power Station;
- Glebe Island Bridge;
- Glebe Island War World II Monument;
- Glebe Island Plaque;
- Glebe Island Sandstone Quarry Sample; and
- Glebe Island Dyke Exposures.

4.3.1 SHR#01015 - WHITE BAY POWER STATION

The following Statement of Significance for the SHR#01015 - White Bay Power Station is sourced from the NSW State Heritage Inventory, Heritage Item ID 5001335:

White Bay Power Station was the longest serving Sydney power station and is the only one to retain a representative set of machinery and items associated with the generation of electricity in the early and mid twentieth century. It retains within its fabric, and in the body of associated pictorial, written archives and reports and oral history recordings, evidence for the development of technology and work practices for the generation of electrical power from coal and water. This development of power generation at White Bay contributed to the expansion of the economy of Sydney and New South Wales.

As a result of its remarkably intact survival, it retains the unique ability to demonstrate, by its location, massing, design, machinery and associated archives, the influence and dominance that early power-generating technology exerted on the lives and urban fabric of inner cities in the first half of the 20th century. The extant items within the surviving operational systems are of an impressive scale and exhibit a high degree of creative and technical achievement in their design and configuration. They encompass all aspects of the generation of electrical power, and represent all phases from the inter-war period through to the more sophisticated technologies of the mid 20th century. They are of exceptional technical significance with research potential to yield information not available from any other source.

Aesthetically, White Bay Power Station contains internal and external spaces of exceptional significance. These spaces include raw industrial spaces of a scale, quality and configuration which is becoming increasingly rare and which inspire visitors and users alike. Externally, it is a widely recognised and highly visible landmark, marking the head of White Bay and the southern entry to the Balmain Peninsula and its industrial waterfront. It retains a powerful physical presence and industrial aesthetic and is the most important surviving industrial building in the area.

White Bay Power Station has strong and special associations and meanings for the local community, for former power station workers and for others who have used the site, and is of high social significance. It is a potent symbol of the area's industrial origins and working traditions, aspects of community identity that are strongly valued today by both older and new residents. It is one of the few surviving features in the area that provide this symbolic connection.

It is the only coal based industrial structure, dependent on a waterside location to survive adjacent to the harbour in the Sydney Region. It also forms part of a closely related group of large scale industrial structures and spaces (White Bay Container Terminal, Glebe Island Silos, Container Terminal and Anzac Bridge) which along with the White Bay Hotel, define a major entry point to the city from the west.

It is of exceptional structural significance to the State of New South Wales. (Design 5, 2004)

4.3.2 SHR#01914 - GLEBE ISLAND BRIDGE

The following Statement of Significance for the SHR# 01914- Glebe Island Bridge is sourced from the NSW State Heritage Inventory, Heritage Item ID 5051118:

The Glebe Island Bridge, across Johnstons Bay, is of state significance as it demonstrates one of the earliest examples of an electric-powered swing bridge in Australia. Technically, it is a complementary structure to the already acclaimed Pyrmont Swing Bridge, and has all the same significant features, including the electrically-driven swing span. Both bridges were designed by Percy Allan, a highly-regarded Australian bridge designer of the late 19th and early 20th century. Both represent the only examples of such types of bridges in New South Wales and are still operable.

4.3.3 SHI#4560012/ITEM 5 - GLEBE ISLAND WORLD WAR II MONUMENT

The following Statement of Significance for the SHR#4560012 – Glebe Island World War II Monument/Item 5 – Monument, Glebe Island is sourced from the NSW State Heritage Inventory, Heritage Item ID 4560012:

The monument commemorating the first landing of the United States armed forces at Glebe Island and the subsequent role of the Port authorities in moving personnel and supplies as part of the War effort is of local significance. It is a physical reminder of a brief but important period in the history of Glebe Island. It provides a reminder of the role that the Port of Sydney and the NSW rail network played in the disembarkation and distribution of personnel and equipment during World War II.

4.3.4 SHI#4560013 - GLEBE ISLAND PLAQUE - OPENING OF CONTAINER TERMINAL

The following Statement of Significance for the SHR#4560013 – Glebe Island Plaque - Opening of Container Terminal is sourced from the Port Authority of NSW heritage inventory sheet:

The plaque is of local historical significance as it commemorates the opening of the Container Terminal at Glebe Island. The Container Terminal was an important innovation in the operation of the port and was a direct response to changes in international shipping.

4.3.5 SHI#4560014 - GLEBE ISLAND SANDSTONE QUARRY SAMPLE

The following Statement of Significance for the SHR#44560014 – Glebe Island Sandstone Quarry Sample is sourced from the Port Authority of NSW heritage inventory sheet:

Of local significance in illustrating the range of early industries that once occupied Glebe Island and surrounding areas, especially sandstone quarrying, which was an important local industry.

4.3.6 SHI#4560056 – GLEBE ISLAND DYKE EXPOSURES

The following Statement of Significance for the SHI#4560056 – Glebe Island Dyke Exposures is sourced from the Port Authority of NSW heritage inventory sheet:

The Great Sydney Dyke, although extensive with a length exceeding 10km, has only been sampled in the subsurface part as a part of geotechnical investigations for engineering projects. The exposures at Glebe Island provide a rare opportunity to examine the dyke at the surface level.

2.8 Ecological Assessment

Following the public notification and exhibition of DA 21/13182, public submissions were received by the DPHI raising concern about the potential ecological impacts of the Silos advertising lighting on local wildlife, particularly nocturnal birds and bats. As part of the Response to Submissions (RtS) prepared by Urban Concepts, an Ecological Assessment Report (EAR) was prepared by Cumberland Ecology and submitted by the Applicant. This included a Fauna Impact Assessment for threatened fauna species potentially impacted by the project.

As part of the Pre-Application consultation with the DPHI, the submission of an Ecological Assessment Report (EAR) was requested for this Modification Application. The report was to address the NSW Biodiversity Conservation Act 2016 (BC Act) and Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act).

Cumberland Ecology was commissioned to prepare the EAR and it is reproduced in Appendix J of this report. The EAR has considered the impacts of extending the display of the advertising on the Silos (noting that no changes are proposed to the existing signage including its illumination) on the nocturnal birds and bats, and considers recent changes to the locality and intended future developments, including:

- The Rozelle Parklands; and
- The adjacent Bays West Stage 1 and White Bay Power Station areas.

Confirmed species records within the locality have been used to assess which species may potentially be impacted by the light spill produced by the existing development, particularly species which are listed as threatened under the NSW Biodiversity Conservation Act 2016 (BC Act) and Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). The following Sections have been reproduced from the Cumberland Ecology EAR which detail the habitat assessment, threatened fauna, the Biodiversity Conservation Act 2016 requirements as they relate to the proposal and the Impact Assessment. Appendices A and B of the EAR details the list of threatened species with confirmed records in the locality and a Test of Significance for each class of threatened species (birds and bats) has also been made.

2.8.1 Habitat Assessment

The following extract is reproduced from Section 3.1 Habitat Assessment of the Cumberland Ecology EAR.

The subject site is completely lacking in vegetation or artificial structures that may be considered suitable habitat for native species including birds and bats. It is located in an extremely urban context, and the entire area surrounding the Silos is surrounded by sealed surfaces, and major highways. The project is situated in a highly urbanised locality with very limited vegetation and high levels of existing light pollution from surrounding buildings and infrastructure such as Victoria Road and the Anzac Bridge. Accordingly, it is not expected that any species would nest or forage in the subject site, but there is some low potential for aerial species to encounter the site while foraging in the wider area or as part of migratory routes.

It is understood that the Rozelle Parklands and Bays West Precinct are currently under construction and will include plantings of vegetation and the construction of wetlands. The new development has vast open space which has provided additional shared path connections to the Anzac Bridge and view lines to the Silo signage. These areas are in relatively close proximity to the subject site and may offer some future potential foraging resources for bird and bat species, depending on the vegetation that is planted.

That, notwithstanding, the Rozelle Parklands and Bays West Precinct also occur in a highly urbanised area with minimal habitat for native species. Accordingly, any fauna species that would have potential to occur are likely to be urban adapted and habituated to high levels of night light in the environment. As these developments are finalised, they will have their own lighting regimes, so any species utilising habitat in these areas in the future would be acclimated to the light spill associated with the adjacent subject site.

Several parks currently occur in the locality, including Bicentennial Park, Glebe Foreshore Park, and Jubilee Park, on the other side of Rozelle Bay to the subject site. These parks currently contain grassed areas and some planted canopy trees and would likely provide some habitat for native species, including birds and bats. Due to the complete absence of habitat in the subject site, it is considered unlikely that it is used by any native species, particularly given that areas of potential habitat occur relatively nearby.

2.8.2 Threatened Species

The EAR states that although no fauna have been recorded within the subject site, a number of species listed as threatened under the BC Act and/or EPBC Act have been recorded within the wider locality. This has been provided within Appendix B of the EAR. This includes both birds and bats. The following extract is reproduced from the EAR in regard to threatened fauna and any potential impact from lighting from the signage:

The species with potential to be impacted by lighting from the project are limited to nocturnal species, and therefore this assessment focusses mainly on the potential impact of the lighting on threatened nocturnal species. These are limited to the Grey-headed Flying-fox, the Sooty Owl, the Powerful Owl, the Barking Owl, and nine threatened Microchiroptera bat species.

Despite several nocturnal species being recorded from the locality, the subject site does not provide any foraging, breeding or roosting habitat for these species. There is no vegetation of any kind in the subject site that could provide habitat for native species, and shoreline habitat is also absent. The interface between the marine habitats in White Bay and Johnstons Bay and Glebe Island is entirely artificial and appears to be constructed from concrete. This precludes the possibility of the shoreline being used for foraging or nesting purposes by migratory shorebirds, also considering the complete lack of any fringing vegetation. As no site inspection has been undertaken, it is uncertain if there is potential for microbats to utilize the structures present for roosting, however, due to the lack of foraging vegetation in the vicinity of the subject site, it is unlikely that a significant number of bats would roost in the subject site, if any.

The Grey-headed Flying-fox, the nocturnal microbats and the owl species recorded from the locality are all fundamentally mobile and there is potential for them to fly through occasionally, however this is likely to only occur from time to time due to the absence of suitable habitats surrounding the subject site.

The introduction of new vegetation in the nearby Rozelle Parklands and Bays West Precinct may provide some additional foraging resources near to the subject site if suitable tree species are planted. However there is no reason to suggest that these species would transit through the subject site on their way to other more remote habitats, except occasionally.

2.8.3 Impact of Proposal on Nocturnal Species

Section 3 of the Cumberland Ecology EAR report provides a detailed list of each of the species with potential to be impacted by lighting from the advertising on the Silos. They are limited to nocturnal species, including the Grey-headed Flying-fox, the Sooty Owl, the Powerful Owl, the Barking Owl, and nine threatened Microchiroptera bat species.

An assessment of the impact of the project on nocturnal threatened species is set out in Section 4 of the EAR followed by an assessment of compliance with the Wildlife Light Pollution Guidelines. Tests of Significance were undertaken for all threatened species considered to have the potential to be impacted by the project. This assessment is contained in Appendix C of the EAR. Refer to Appendix J.

2.8.4 Biodiversity Conservation Act 2016 Assessment

Cumberland Ecology assessed the proposal under the relevant provisions of the Biodiversity Conservation Act 2016 (BC Act) and have advised that a key part of the BC Act is the introduction of the Biodiversity Offsets Scheme (BOS). The BOS applies to local development (assessed under Part 4 of the EP&A Act) that is likely to significantly affect threatened species or communities or that triggers threshold levels for when assessment via the BOS is required. The threshold has three elements:

- Whether the amount of native vegetation being cleared exceeds a threshold area;
- Whether the area being cleared is mapped on the Biodiversity Values map published by the Minister for the Environment; and
- Whether the impact on threatened species or ecological communities is deemed significant.

Cumberland Ecology has confirmed that the proposal does not trigger the BOS, nonetheless an impact assessment has been undertaken. The relevant extracts from Section 4 of the EAR assessment are below.

If a proposed development triggers entry into the BOS, the ecological assessment requires preparation of a Biodiversity Development Assessment Report (BDAR) by an accredited assessor. A BDAR is not required if a proposed development does not trigger entry into the BOS. An assessment of whether the current MA triggers these threshold levels is provided below.

The native vegetation clearing thresholds are defined in Part 7.2 of the Biodiversity Conservation Regulation 2017. As the current development application is limited to an extension to continue display of existing signage on the Glebe Island Silos, no native vegetation is proposed to be cleared. Therefore the current MA does not trigger the BOS by this mechanism.

Under the BC Act the Biodiversity Values Map (BV Map) identifies sites which are considered to have significant environmental values which require the preparation of a Biodiversity Development Assessment Report (BDAR) to accompany any DA for impacts to these areas. As the site that is the subject of the current MA is not on the BV Map, the BOS is not triggered by this mechanism.

As presented in Sections A.3.1. and Section A.3.2. of this letter, the subject site does not comprise suitable habitat for any threatened species. Nonetheless a precautionary approach has been taken and Tests of Significance have been prepared for threatened nocturnal fauna with potential to occur in the locality of the subject site. Based on the results of the Tests of Significance presented in Appendix C, a significant impact on threatened species is unlikely to occur as a result of the proposed MA and therefore the BOS threshold is not triggered by this mechanism.

Accordingly, a BDAR is not required under the Biodiversity Offsets Scheme (BOS) and this Desktop Ecological Assessment is deemed suitable ecological documentation for the purpose of assessing the ecological impacts of the current MA.

Furthermore, in relation to Modifications of planning approvals or activities, Clause 7.17 (2)(c) of the BC Act states that 'however a further biodiversity development assessment report is not required to be submitted if the authority or person determining the application for Modification (or determining the environmental assessment requirements for the application) is satisfied that the Modification will not increase the impact on biodiversity values'

The current MA seeks a new three-year consent duration for the display of advertising signage with no changes in current luminance level. As the current MA is limited to a continuation of existing lighting within a highly urbanised area with limited to no habitat values for native flora and fauna, the MA is not considered to result in any increases in impact on biodiversity values. Nonetheless, an impact assessment has been conducted as a precautionary measure and is detailed in the following Sections.

Groups of species that share similar habitat requirements were assessed collectively and are summarised below. The assessed species are not considered to be significantly impacted by the project.

4.1.1 Grey-headed Flying-Fox

The Grey-headed Flying-fox has been recorded within the locality, however, this species is unlikely to use the subject site for foraging purposes as it does not contain any vegetation. It roosts/breeds in camps which do not occur within the subject site. This species is highly mobile and would likely only encounter the subject site on occasion as part of a much broader foraging range on its way to and from foraging resources further afield.

The closest roosting camps are approximately 5 km away which, given the intensity and directionality of the lighting, are unlikely to be impacted by the light spill generated by the project.

Since the advertising signage has been operating in its current location for over 30 years, it is likely that the Grey-headed Flying-fox would have become habituated to the existing light spill. The project has implemented the National Light Pollution Guidelines for Wildlife (DoEE 2020) and ceases operating the lights at 11 pm, eliminating any light spill effects for the majority of night-time hours. Furthermore, the lighting for the project complies with Australian Standard AS 4282-2023 Control of the obtrusive effects of outdoor lighting. The project does not propose an increase in current intensity light levels and therefore the project will still be in compliance with the standard.

A Test of Significance has been prepared for this species and is presented in Appendix C. This assessment indicates that the project is unlikely to have a significant impact on the Grey-headed Flying-Fox.

4.1.2 Owls

Threatened owls recorded from the locality include the following species:

- Powerful Owl (*Ninox strenua*);
- Barking Owl (*Ninox connivens*); and
- Sooty Owl (*Tyto tenebricosa*).

Although the above owl species have all been recorded within the locality, due to the complete lack of any kind of foraging, breeding or roosting habitat in the subject site, they are very unlikely to occur. However, these species are highly mobile and have potential to fly over the subject site on occasion to access resources from other parts of the landscape as part of a broad foraging range.

Since the advertising signage has been operating in its current location for over 30 years, it is likely that local owl species would have become habituated to the existing light spill. The project has implemented the National Light Pollution Guidelines for Wildlife (DoEE 2020) and ceases operating the lights at 11 pm, eliminating any light spill effects for the majority of night-time hours.

Furthermore, the lighting for the project complies with Australian Standard AS 4282-2023 Control of the obtrusive effects of outdoor lighting. It is understood that this standard has been updated since the last Modification, however the lighting still meets the requirements of the standard. The project does not propose an increase in current intensity light levels and therefore the project will still be in compliance with the standard.

A Test of Significance has been prepared for these owl species and is presented in Appendix C. This assessment indicates that the project is unlikely to have a significant impact on these species.

4.1.3 Microchiropteran Bats

Threatened microchiropteran bats recorded from the locality include the following species:

- Yellow-bellied Sheath-tail-bat (*Saccolaimus flaviventris*);
- Eastern False Pipistrelle (*Falsistrellus tasmaniensis*);
- Large Bent-winged Bat (*Miniopterus orianae oceanensis*);
- Little Bent-winged Bat (*Miniopterus australis*);
- Large-eared Pied Bat (*Chalinolobus dwyeri*);
- Greater Broad-nosed Bat (*Scoteanax rueppellii*);
- Southern Myotis (*Myotis macropus*); and
- Eastern Coastal Free-tailed Bat (*Micronomus norfolkensis*).

Although the above Microchiroptera bat species have all been recorded within the locality, these species are unlikely to use the subject site for foraging or roosting purposes it does not contain any vegetation or suitable man-made structures. These species are highly mobile and have potential to fly over the subject site on occasion to access resources from other parts of the landscape as part of a broad foraging range.

Since the advertising signage has been operating in its current location for over 30 years, it is likely that local Microchiroptera bat species would have become habituated to the existing light spill. The project has implemented the National Light Pollution Guidelines for Wildlife (DoEE 2020) and ceases operating the lights at 11 pm, eliminating any light spill effects for the majority of night-time hours. Furthermore, the lighting for the project complies with Australian Standard AS 4282-2013 Control of the obtrusive effects of outdoor lighting. The project does not propose an increase in current intensity light levels and therefore the project will still be in compliance with the standard.

A Test of Significance has been prepared for these Microchiroptera bat species and is presented in Appendix C. This assessment indicates that the project is unlikely to have a significant impact on these species.

2.8.5 The National Light Pollution Guidelines Assessment

An assessment of compliance with the Wildlife Light Pollution Guidelines was also undertaken by Cumberland Ecology. The National Light Pollution Guidelines for Wildlife (DoEE 2020) describes the best practice lighting design principles for infrastructure with external lighting in order to minimise potential impacts to wildlife. Cumberland Ecology have advised that to the extent that is practicable, this project has implemented these principles. The following extract from the Cumberland Ecology EAR addresses these principles.

1. Start with natural darkness and only add light for specific purposes.

The project is located in an area with a high level of existing light pollution from surrounding buildings and infrastructure such as Victoria Road and the Anzac Bridge. The baseline light level in the locality is therefore not natural darkness. The project requires light for the specific purpose of lighting the signage which would otherwise not be visible during nighttime hours.

2. Use adaptive light controls to manage light timing, intensity and colour.

The project involves the use of LED lights which are able to be controlled remotely, implementing a light regime which includes the timing of the lights to only come on after sunset and turn off according to curfew at 11 pm, limiting the amount of exposure to local wildlife and eliminating light spill effects for the majority of nighttime hours. Additionally, the use of adaptive light controls ensure that the intensity of the light will remain at the current luminance level of 58 cd/m².

3. Light only the object or area intended – keep lights close to the ground, directed and shielded to avoid light spill.

Due to the nature of the project and the signage being visible from the elevated roadway, keeping lights close to the ground is not feasible and would only create additional light spill. However, the lights are shielded and are currently illuminating the signage from above and directed downwards to minimise light spill.

4. Use the lowest intensity lighting appropriate for the task.

The project proposes to retain the existing signage luminance level which is currently set at 58 cd/m², well below the maximum permissible nighttime luminance of the signage of 350 cd/m² and thereby using the lowest intensity lighting appropriate for the task.

5. Use non-reflective, dark-coloured surfaces.

Due to the nature of the project as advertising signage, the image contained within the sign changes periodically. The presence of dark-coloured surfaces would therefore vary from time to time, depending on which advertisement is currently in place.

6. Use lights with reduced or filtered blue, violet and ultra-violet wavelengths.

The types of lights currently in use for the project and the use of reduced or filtered blue, violet and ultra-violet wavelengths is unknown.

The National Light Pollution Guidelines for Wildlife does not provide recommendations relating to specific wattage or light intensity as the degree of impact of those factors on wildlife is dependent on each species. Instead, it recommended that projects requiring outdoor lighting consider the six best practice lighting design principles detailed above.

2.8.6 Conclusion and Findings of the Ecological Assessment.

The following conclusions have been reached by Cumberland Ecological in relation to the proposal to extend the duration of the consent for a three (3) year term.

The project entails the lodgement of a Modification Application, seeking a new three-year consent duration for the display of advertising signage in the subject site. The project does not propose a change in current luminance level that will remain at approximately 58 cd/m².

Several threatened fauna species have been recorded from the locality, however those with potential to be impacted by the project are limited to nocturnal species which are active while the advertising signage is operating. Nocturnal threatened species with potential to occur in the subject site include the Grey-headed Flying-fox, three owl species and several microchiropteran bats.

Although these species have all been recorded within the locality, due to the complete lack of any kind of foraging, breeding or roosting habitat in the subject site, they are very unlikely to occur. However, these species are highly mobile and have potential to fly over the subject site on occasion to access resources from other parts of the landscape as part of a broad foraging range.

Since the advertising signage has been operating in its current location for over 30 years, it is likely that these threatened species would have become habituated to the existing light spill. The project has implemented the six best practice lighting principles detailed in National Light Pollution Guidelines for Wildlife (DoEE 2020) to the extent that is practicable and ceases operating the lights at 11 pm, eliminating any light spill effects for the majority of night-time hours.

Furthermore, the lighting for the project complies with Australian Standard AS 4282-2013 Control of the obtrusive effects of outdoor lighting. The project does not propose an increase in current intensity light levels and therefore the project will still be in compliance with the standard.

Assessments have been conducted in accordance with the requirements of Section 7.2 and Section 7.3 of the BC Act and have confirmed that the project does not occur in an Area of Outstanding Biodiversity Value nor does it trigger any of the BOS thresholds.

Tests of Significance in accordance with Section 7.3 of the BC Act have been completed for the Grey-headed Flying-fox, owl species and microchiropteran bats that have been recorded for the locality, and these indicate that the signage is unlikely to have a significant impact on these species. As the MA does not trigger entry into the BOS and will not result in any increases to impacts on biodiversity values compared to the current existing approvals, a BDAR is not required to accompany the MA.

2.9 Structural Integrity

In March 2025, the Applicant commissioned Lewis Consulting Structural Engineers to undertake a structural assessment of the signage as part of its ongoing maintenance regime. The assessment involved:

- The desktop review of previous Structural Condition Reports;
- Detailed site survey of the existing steel framing;
- Documentation of existing structural framing;
- Structural analysis of wind loading in accordance with AS 1170.2-2021;
- Structural analysis of the steel framing supporting screen; and
- Review of the existing structure for adequacy and compliance with current relevant Australian Standards.

The Structural Certification concludes that the signs are compliant with all relevant standard building codes. The following extract is reproduced from the Structural Certification attached at Appendix L

The structural design assessment of the existing steel sign framing has been assessed in accordance with relevant provisions of the standard building codes current at the time of the review and in accordance with accepted engineering practice and principles. In particular the assessment is in accordance with:

- AS 1170 Structural Design Actions (AS1170.0-2002, AS1170.1-2002, AS1170.2-2021, AS1170.4-2007)
- AS 4100 Steel Structures – 2020

Our findings from the structural analysis were as follows:

- ***The Southern Elevation of the screen steel framing was determined as being structurally adequate and compliant with Australian Standards as noted above.***
- ***The Western Elevation of the screen steel framing was determined as being structurally adequate and compliant with Australian Standards as noted above.***

3. STRATEGIC PLANNING CONTEXT AND JUSTIFICATION FOR THIS APPLICATION

3.1 Introduction

The key driver for the redevelopment of the Bays West Precinct is the delivery of the Bays West Sydney Metro West Station by 2023. This will unlock opportunities for the renewal of Stage 1 of Bays West and the broader Bays West locality. This Section of the SEE outlines the most recent strategic planning that has been undertaken for Bays West and its contextual relationship to the Glebe Island Silos. The justification for this Modification is also examined.

3.2 Overview

The site is located within the Bays Precinct, which comprises the renewal of three (3) key sites being Blackwattle Bay, The Sydney Fish Markets and Bays West. This Precinct has historically been used for maritime, light industrial and working harbour purposes.

Land within Bays West comprises the Glebe Island Silos, White Bay Power Station, Rozelle Rail Yards, Rozelle Bay and White Bay. Refer to Figure 3.1. The land is almost entirely owned by the NSW Government. Several NSW Government Agencies own, manage, and use the site's land, waterways, wharves, and infrastructure. For this reason, The Port Authority is one of the key stakeholders within the Bays Precinct. Bays West is predominately located in the Inner West Council Local Government Area (LGA) however a small part of the precinct (eastern abutment of the Glebe Island Bridge) is in the City of Sydney LGA.

In 2014, the strategic planning process for Bays West was led by the NSW Development Corporation, Urban Growth. In 2015, Urban Growth released The Bays Precinct Sydney Transformation Plan. This Plan presented *'a blueprint to transform Bays Precinct into a bustling hub of enterprise, activity and beautiful spaces. Located within the iconic Sydney Harbour, the area will be enjoyed by Sydneysiders and the global community alike'*

Under the Plan, Glebe Island was to support the blue economic activities of the Port and explore its potential for the development of a technological and innovative campus. Glebe Island was identified as a *'longer-term priority destination'*. The plan identified that work was anticipated to start beyond 2022.

In 2017, following the strategic review of Glebe Island by Infrastructure NSW, the NSW Government endorsed a recommendation that the Glebe Island Port facilities be retained and expanded to meet the strategic supply needs of the construction industry, in particular the materials for concrete production being sand, cement and aggregates.

Today, the Port Authority balances the operation of the Port and its commercial tenants with the urban renewal opportunities presented by the Bays West Precinct holistically. To this end, the Port Authority continues to work collaboratively with the NSW Government in forward planning of the Precinct.

FIGURE 3.1 THE BAYS PRECINCT SHOWING NAMES OF EACH SUB-PRECINCT



Source: Inner West Council Website

3.3 Strategic Planning Context

The strategic planning context for the site and its environment is established in:

- Bays West Place Strategy 2021. The Strategy is supported by:
 - The Strategic Place Framework
 - The Urban Design Framework and
 - Connecting with Country Framework
- Bays West Place Based Transport Strategy 2022.
- Bay West Stage 1 Master Plan and Rezoning 2022.
- Stage 1 Bays West – White Bay Power Station (and Metro) Design Guide 2022.
- Bays West Transport Oriented Development Accelerated Precinct.

A graphic representation of the Strategic Planning documents which apply to the Bays West Precinct, prior to the Stage 1 Master Plan and Rezoning being finalised and approved, are shown in Figure 3.2.

FIGURE 3.2 BAYS WEST STRATEGIC PLANNING DOCUMENTS



Source: Summary of the Bays West Stage 1 Draft Master Plan and Urban Design Framework 2022

A description of each plan is as follows.

3.3.1 Bays West Place Strategy 2021

The Bays West Place Strategy was adopted on 15 November 2021. The long-term vision for the Precinct encompasses new employment, housing and recreation uses serviced by the new Metro Station. A key direction of the Bays West Place Strategy is to retain, manage and allow the essential strategic port and maritime industry uses to grow and evolve, to ensure they continue to support the NSW economy.

The Bays West Place Strategy builds upon previous urban renewal work in the wider Bays Precinct and creates a long-term vision for how Bays West will be delivered over time. This is a vision for a connected and vibrant precinct that is an innovative and sustainable new place for living, working and recreation.

The Bays West Place Strategy is supported by two technical companion documents – the Strategic Place Framework and the Urban Design Framework. The Strategic Place Framework is an analysis of the existing Bays West and surroundings to identify a vision and future for the Precinct. The Urban Design Framework will inform the development of the Precinct over time.

The Bays West Place Strategy recognises the importance of retaining the existing port and a working harbour. The NSW Government has retained these operations with the understanding that their configuration can be optimised to retain berth capacity while supporting the Precincts urban renewal ambitions. The Bays West Place Strategy outlines a plan for the initial redevelopment of the Precinct until 2030 as well as longer term through plans 2040 and beyond. Figures 3.2 and 3.3 detail the aspirational 2030 and 2040 structure plans respectively.

The Bays West Place Strategy anticipates the broader renewal of Bays West, including the Glebe Island Silos within Sub Precinct 3, from 2040 and beyond. Importantly, it recognises the Glebe Island Silos as an iconic element which reinforces the distinctive industrial maritime character of Bays West. The Silos will be retained, and opportunities exist for either the continuation of existing uses and/or the introduction of new uses.

The Bays West Place Strategy further states that the Port Authority will work with stakeholders to consider how the future port and maritime functions can evolve and innovate to complement the other land uses within the Bays West area in the future.

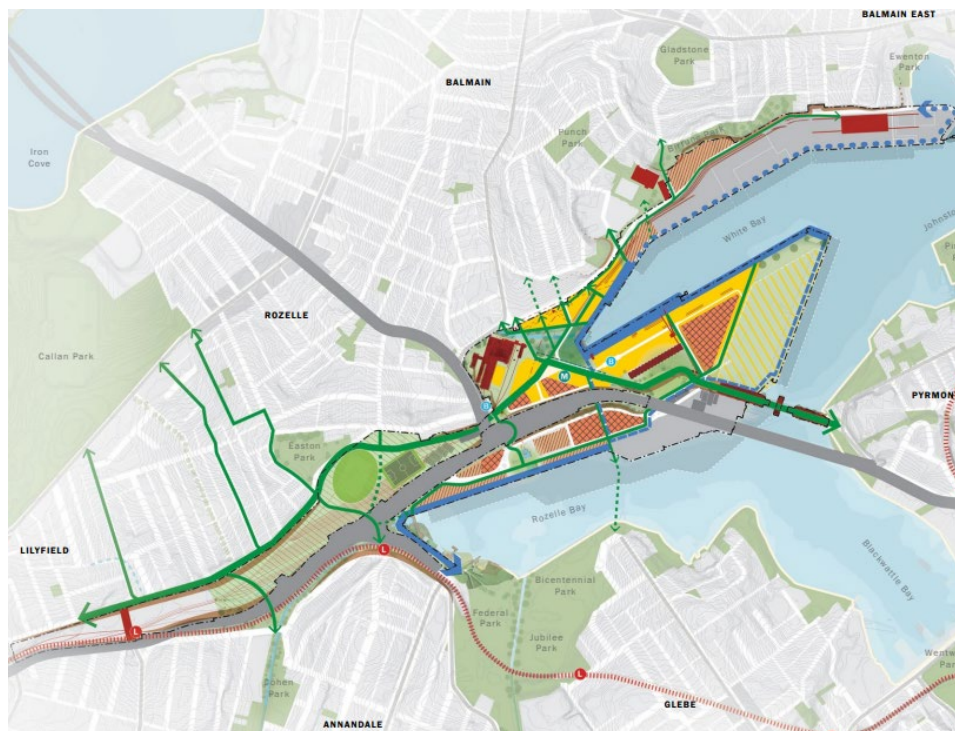
The preparation of the Bays West Place Strategy is the first in a series of steps over several years to realise the vision for the Precinct. The various elements of the Precinct will be delivered by a range of NSW Government Agencies and proponents over the coming decades including:

- Sydney Metro and Transport for NSW (TfNSW) who are progressing the construction of the new Metro Station. The Metro will act as a catalyst for the development of the precinct.
- The DPHI who is progressing the master planning of each Sub-Precincts.

The Bays West Place Strategy identifies ten (10) Sub precincts. Refer to Figure 3.5. The Sub-Precinct boundaries evolved following finalisation of the Bays West Place Strategy to include a larger White Bay Power Station (and Metro) Sub-Precinct boundary and a smaller Robert Street Sub-Precinct boundary. Each Sub-Precinct will undergo a Master Planning and rezoning process. Details on each Sub-Precinct and their specific considerations and opportunities is contained within the Bays West Urban Design Framework.

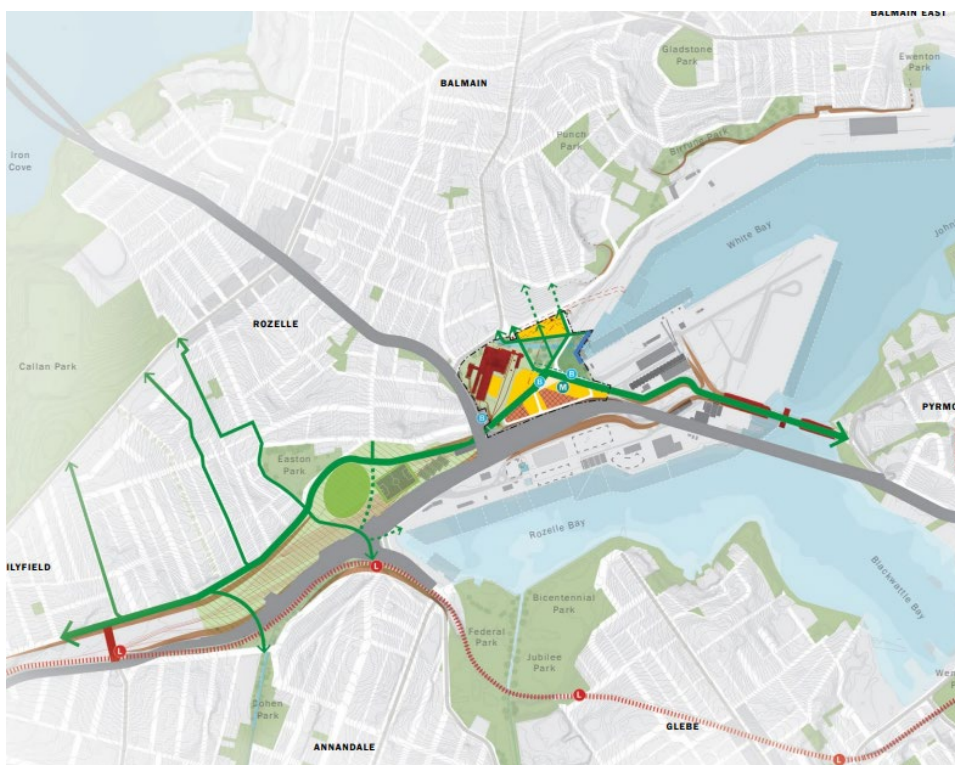
The first stage to be delivered is White Bay Power Station (and Metro) Sub-Precinct (Stage 1). It is envisaged other stages will be developed over time, with the Rozelle Rail Yards Parkland and an integrated port facility being delivered later.

FIGURE 3.3 BAYS WEST INITIAL STAGE STRUCTURE PLAN UPTO 2030



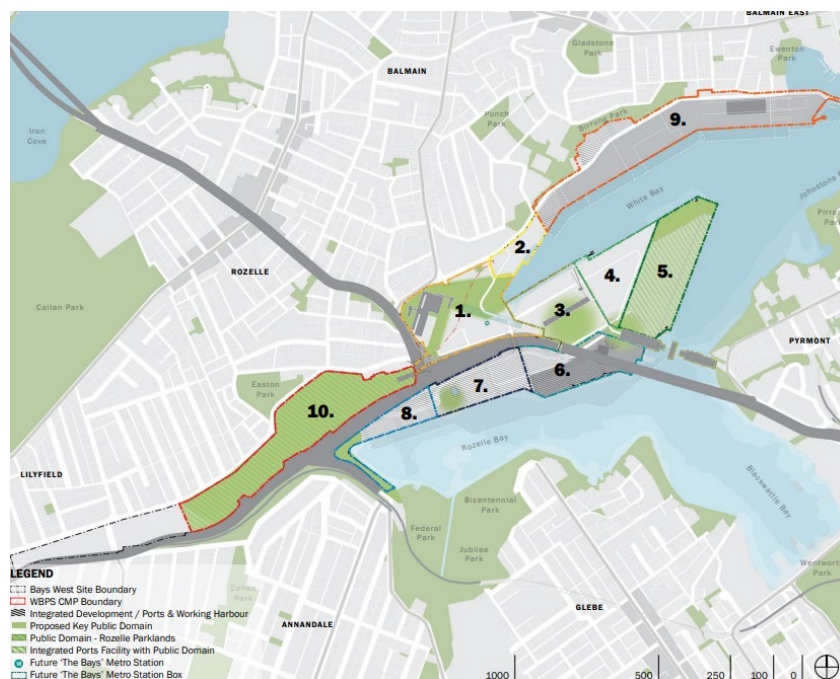
Source: Bays West Strategic Place Framework 2021

FIGURE 3.4 BAYS WEST STRUCTURE PLAN 2040 AND BEYOND



Source: Bays West Strategic Place Framework 2021

FIGURE 3.5 BAYS WEST STRUCTURE PLAN 2021 SUB PRECINCTS



Source: Bays West Strategic Place Framework 2021

The Glebe Island Silos are located in Sub-Precinct 3 and the balance of the working port activities are located in Sub-Precincts 4 (Glebe Island Central), 5 (Glebe Island East) and 9 (White Bay). Sub-Precinct 3 Glebe Island Silos is described in the following extract from the Bays West Place Strategy. The outline of the Sub- Precinct is shown in Figure 3.6. An extract from the Strategy for Sub-Precinct 3 is provided in the highlighted Section below.

Glebe Island Silos

The north-west facing waterfront and the Silos create a character zone which extends and builds out from the White Bay Power Station. A range of activities and uses will create a sub-precinct that is a place to enjoy both new activities and the maritime heritage. In relation to the Silos this may include a continuation of existing uses and/or the introduction of new uses

FIGURE 3.6 BAYS WEST PLACE STRATEGY SUB PRECINCT 3



Source: Bays West Place Strategy 2021

3.3.2 The Bays West Place Based Transport Strategy (2022)

As discussed within Section 2.2 of the Traffic Safety Assessment Report (TSA) prepared by Bitzios Consulting the Bays West Place Based Transport Strategy was released after the granting of consent for DA 21/13182 in September 2022. If realised as planned, Bays West will give rise to more housing and more traffic on Glebe Island. The strategy provides a high-level transport planning analysis which aims to address strategic transport constraints and opportunities in Bays West, underpinned by Transport's Movement and Place Framework and the Place Strategy. The following highlighted extract has been taken from the Bitzios TSA report and explain the transport vision.

The Precinct's vision is to improve walking and cycling networks and lower car use with plans for dedicated cycleways, shared paths and pedestrian crossings. It establishes links within Bays West, including to the Glebe Island Silos, and the surrounding regions through increased active and public transport access and connections. The strategy would integrate existing infrastructure, including potentially reactivating the disused Glebe Island Bridge as a major active transport corridor between Rozelle and Pyrmont. The precinct is intended to evolve the transport network to accommodate increased demand while implementing low (or zero) carbon principles. The development of the area is proposed to make use of existing streets as shown in Figure ES.2, including managing vehicle access to the White Bay Cruise Terminal. Internal streets will be designed to discourage through traffic and provide decoupled parking nodes outside of main activity areas by prioritising pedestrians, cyclists, public transport, car share and service vehicles. Whilst the redevelopment of the area will introduce more traffic into the visual range of the signs, most of the development (and hence local traffic) is located where the signs cannot be seen from. Moreover, as static signs in the distance view, they will have an insignificant influence on the safety for all modes of transport movement.

3.3.3 Bays West Stage 1 Master Plan and Rezoning 2022

The Bays West Stage 1 Draft Master Plan White Bay Power Station (and Metro) and Robert Street Sub-Precincts was placed on public exhibition from 4 May 2022 to 31 May 2022. Feedback from the community and stakeholders informed the further refinement of the Stage 1 Master Plan as part of the Rezoning Proposal. Many of the matters raised during the exhibition period were addressed through the preparation of additional information.

As part of the DPHI's consideration of submissions, the Port Authority's concerns about the compatibility of the introduction of residential uses in Stage 1 and the potential impact such uses would have on potentially inhibiting the existing and future uses of the Port were considered. The Port Authority sought the addition of a clause to ensure the Port functions are considered and protected when assessing how new development responds to existing amenity constraints. The Port Authority also considered that existing and future ports and maritime uses including the White Bay Cruise Terminal, White Bay Berths and uses occurring on Glebe Island should not be compromised by the redevelopment of Stage 1. A key concern is that the existing and future vehicle traffic associated with these uses will be impacted upon by future development.

In August and September 2022, the former DPE (now DPHI) exhibited a draft Rezoning Package for Stage 1 – White Bay Power Station (and Metro). As part of the exhibition of the Rezoning Package, the Port Authority expressed concerns regarding the continuing use of the Port.

The Stage 1 Master Plan and the Rezoning Package was finalised in December 2022. This is the first of the 10 Sub-Precincts to undergo master planning and rezoning. It is envisaged other stages will be commence over time, with an integrated port facility being delivered later. The development of Stage 1 will take 5-8 years, in line with the opening of The Bays Metro Station along the Sydney Metro West Line. The following 2 statements from the Bays West Stage 1 Rezoning and Master Plan Finalisation Report 2022 confirm this timeline:

'This Plan covers the White Bay Power Station (and Metro) and Robert Street sub precincts and informs future development to align with the opening of the Bays Metro Station in 2030.' pg.12
'Bays West Stage 1 is the first of ten sub-precincts in the Bays West Precinct planned for redevelopment. It is envisaged the redevelopment of Bays West Stage 1 will take place over a period of 5-8 years (up to 2030).' pg. 47

Since the release of the Stage 1 Bays West Rezoning and Master Plan 2022, the opening date of the Sydney Metro West Line has been pushed to 2032. This change has the potential to extend the development timeline on Stage 1 by 2 years.

The rezoning of the land uses for Stage 1 under the Precincts SEPP 2021 is shown in Figure 3.7. The resulting scheme includes four (4) land use zones:

- E2 - Commercial Centre
- MU1 - Mixed Use
- RE1 – Public Recreation
- SP1 – Special Activities.

The Stage 1 rezoning proposal aims to deliver:

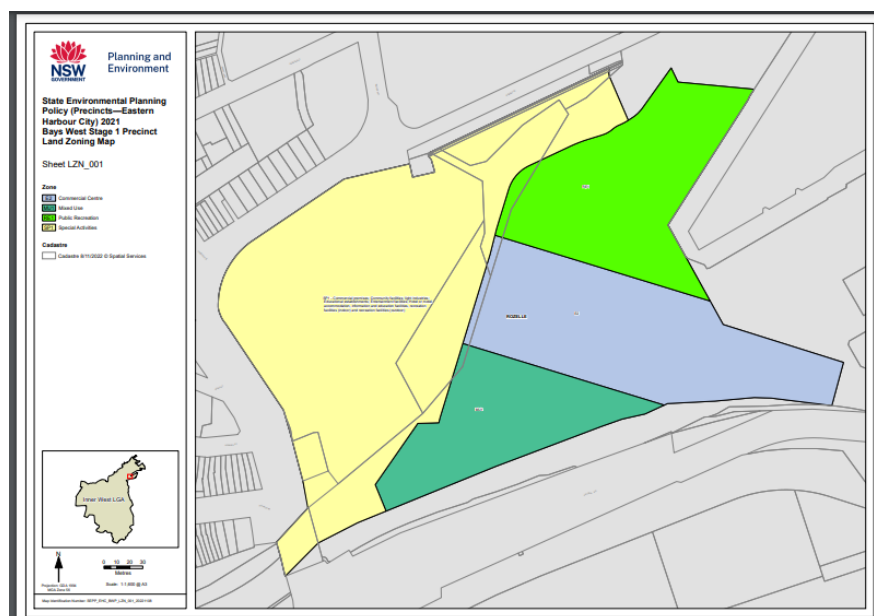
- 78,000sqm of commercial floor space (5,412 jobs) including office and retail premises.
- 23,900sqm residential floor space (250 dwellings).
- 41,650sqm of new public open and green space.
- The revitalisation and protection of heritage-listed White Bay Power Station.
- Supporting social infrastructure including a district multi-purpose community/library hub.
- Improved public and active transport, including cycleways.

The Bays West Stage 1 Rezoning Finalisation Report prepared by the DPHI states that the rezoning is consistent with Planning Priority E9 – Growing international trade gateways for the following reasons which confirms the continuing use of the port and working harbour: As evidenced by the following highlighted extract:

The Bays West precinct will evolve over time into a mixed-use precinct integrated with enhanced port and working harbour activities. This includes creating an international gateway at the Cruise Terminal, capitalising on the innovation corridor to adapt to new technologies and sustainable port operations. as well as building a world-class foreshore walk with walking and cycling connections to surrounding areas The proposed amendments will reinforce Bays West as a mixed-use precinct integrated with enhanced port and working harbour activities.

Source: DPHI Bays West Stage 1 Rezoning Finalisation Report 2022

Any master planning and rezoning of the remaining land within the Bays West Precinct will need to consider and respond appropriately to the final controls and land use zones that apply to Bays West Stage 1.

FIGURE 3.7 PRECINCTS SEPP BAYS WEST STAGE 1 PRECINCT LAND ZONING MAP.

Source: NSW Planning Portal 2025

3.3.4 Stage 1 Bays West – White Bay Power Station (and Metro) Design Guide 2022

This Design Guide 2022 provides guidance for development within the Stage 1 site. It comprises a hierarchy of objectives and provisions to inform future design and development. The Stage 1 site has been broken into four (4) key development precincts, the location of the precincts is shown in Figure 3.8.

The Glebe Island Silos are located immediately adjacent to the Site A. Site A includes The Bays Metro Station, associated services buildings that enable the operation and maintenance of the station, as well as employment-generating commercial and retail premises above and adjoining the station. Residential development has not been ear marked in this location.

Site B is located to the Southwest of the Glebe Island Silos and is proposed to be a vibrant mixed-use development, comprising of 23,900sqm residential floor space (250 dwellings). Due to the residential land use component of Site B the continuation of the Silos advertising display has considered the future development scenario for this Precinct. It is illustrated in Figures 3.9 and 3.10. The Southern Development blocks will consist of 16,466sqm (173 dwellings) and the Wedge Development will consist of 7,457 (77 dwellings). The southwestern positioning of the development could result in sight lines to the western sign. The Bays West Stage 1 Design Guide states that impacts of lighting from surrounding land uses will be mitigated in the location, design and construction of residential dwellings. This statement from the Bays West Stage 1 Design Guide reinforces this intention:

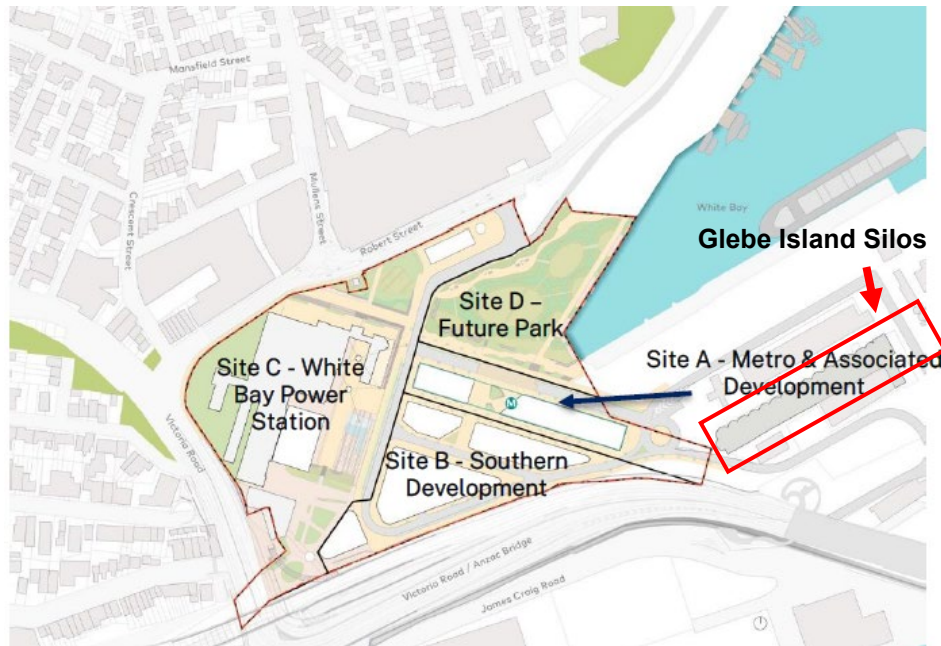
Residential development will be located, designed and constructed to adequately mitigate noise, air quality and lighting impacts associated with nearby major roads and adjoining Bays West port and working harbour uses to ensure an acceptable amenity for future residents.

The 5–8-year development timeline of the proposed residential dwellings will not coincide with the proposed three (3) year extension to the display duration. However, in a highly unlikely case of development, the Urbis VIA has concluded that the desired future character of Site A & B is compatible with the signage as indicated by the following extract.

Site A: We note the high compatibility of the signage with the future desired character of Site A and fleeting nature of visibility from within Site A as users move through the space in transit. We note the development timeframe for Precinct A is greater than the 3 year consent term sought by the proposed Modification Application.

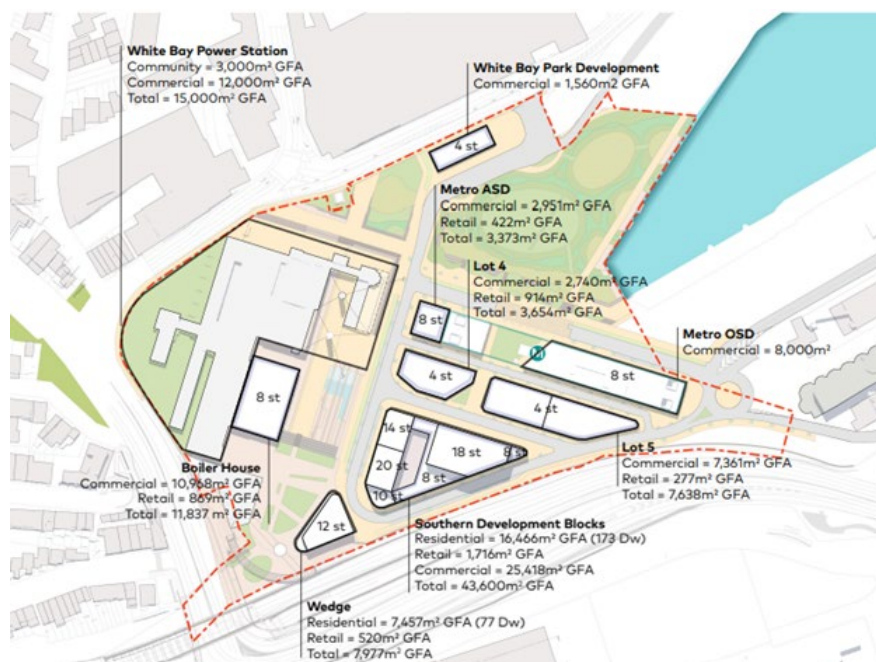
Site B: We note the high compatibility of the signage with the future desired character of Site B as a diverse, highly activated and fine grain transit oriented development, where signage inevitably forms part of the visual context.

FIGURE 3.8 KEY DEVELOPMENT PRECINCTS



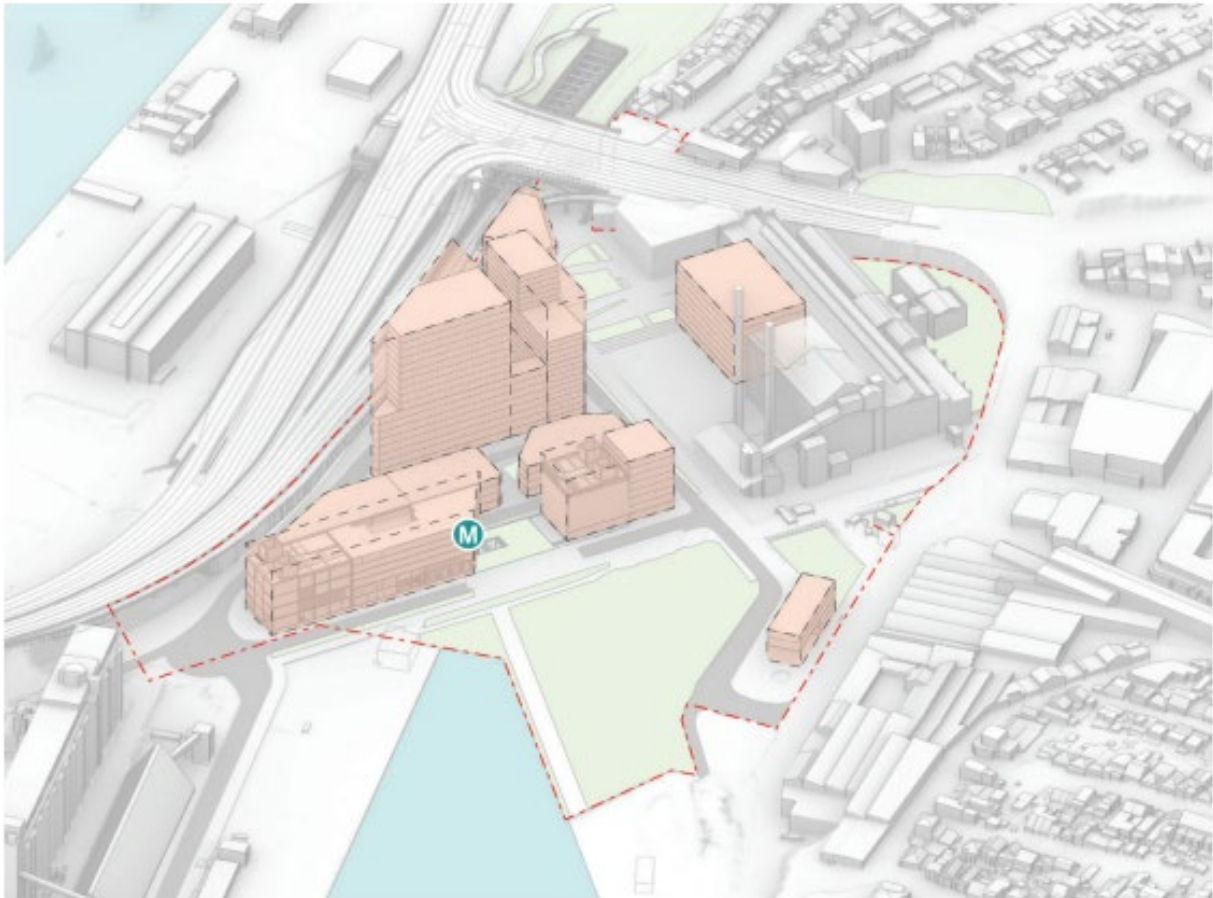
Source: Bays West Stage Urban Design Framework 2022

FIGURE 3.9 BAYS WEST STAGE 1 GFA YEILDS



Source: Bays West Stage Urban Design Framework 2022

FIGURE 3.10 BAYS WEST STAGE 1 PROPOSED BUILDING HEIGHTS AND SEPERATION WITH ENVELOPES



Source: Bays West Stage Urban Design Framework 2022

3.3.5 Bays West Transport Oriented Development Accelerated Precinct

In addition to the above, Bays West has now been identified by the DPHI as a Transport Oriented Development (TOD) Accelerated Precinct because it will have the capacity to support more new homes close to a transport hub when the new Bays Metro Station opens in 2032.

The Bays West TOD rezoning proposal will build on the vision of the Bays West Place Strategy and Bays West Stage 1 Rezoning, so that the provision of additional housing can be accelerated in the Bays West Precinct.

The Bays West TOD will include staged Master Plans for the Sub-Precincts and track on a different timeline to the other TOD accelerated precincts due to the need to resolve working harbour and ports uses.

Further community consultation for the Bays West TOD rezoning proposal is expected when it goes on exhibition in mid-2025 when it goes on public exhibition.

3.4 Justification for the Application

After considering the strategic planning context and the desired future character and development outcomes sought over the next eight (8) years, the proposed Modification to extend the duration of the consent for the roof signage on the Glebe Island Silos for a further three (3) year term is justified for the following reasons:

- A three (3) year extension to the consent duration would expire in or around September 2028. This is two (2) years earlier than the development outcomes envisaged under the Bays West Strategic Place Framework (Structure Plan 2030). These outcomes are:
 - The Bays Metro Station will open and be operational (in 2032).
 - The White Bay Power Station (and Metro) Sub-Precinct will be fully planned and under development.
 - The curtilage of the White Bay Power Station will be integrated with the rest of the Sub-Precinct.
 - Active travel connections will have been investigated and implemented where feasible, with links through Bays West back into Balmain and the surrounding areas.
 - The Rozelle Parklands is fully constructed.
- In addition to the above works, there will be several temporary changes around the Silos to enable the delivery of infrastructure across Sydney. Land to the west of the Silos has been identified as 'Bays Temporary Land' to facilitate construction activities. The Port Authority land to the east and north-east of the Silos is identified as an Indicative Western Harbour Tunnel Temporary Use Zone.
- Following the approval of DA 21/13182 the Port Authority entered into a commercial lease agreement with the Applicant Eye Drive Sydney Pty Ltd for the ongoing display of the existing signage at the top of the Glebe Island Silos, given their understanding that Sub Precincts 3,4 and 5 would not be developed before 2030.
- In 2021, when the proponent was preparing the now approved DA 21/13182, both the Department of Planning and Environment (now the DPHI) and Inner West Council acknowledged that it would be unlikely that any development will occur to Sub-Precincts 3,4 or 5 prior to 2030 given the substantial master planning required to establish the detailed development scenarios for each Sub-Precinct.
- As part of the preparation of this Modification, it was acknowledged by the DPHI that there was little or no prospect of any new residential development occurring within the Sub-Precinct 1, to the west of the Glebe Island Silos, within the next 3 years given that the Master Plan and rezoning package was only approved in December 2022.
- As the existing advertising signage is identified as a 'roof sign' under the provisions of Clause 3.19 of the IESEPP 2021, the maximum consent duration that can be applied to any consent is ten (10) years. The proposed Modification to DA 21/13182 only seeks an additional three (3) year term, which will provide for a total consent duration of six (6) years through to 2028 which is well within the ten (10) year term which can be applied under Chapter 3 of IESEPP 2021 and well before the likely timeframe for any physical development of Sub-precinct 1 (as identified in the Bays West Place Strategy).
- Further to the above, each of the specialist consultants reports that have been commissioned for this Modification Application have examined a scenario of future land use within the immediate vicinity of the site. Specifically, the Electrolight Australia LIA concludes that if development within the Southern Development area (Site B of the Bays West Stage 1 Design Guide) did occur within the three (3) year term being sought by this Modification, the existing luminance of the signage can remain unchanged.

4. DESCRIPTION OF THE PROPOSED MODIFICATION

4.1 Introduction

This Modification Application applies to the development consent for the existing roof signs that are located on the southern and western elevations of the Glebe Island Silos as illustrated by the Photographs at Figure 1.2 and 1.3 in this SEE. The existing signage is detailed on the approved development application plans that were prepared by Arcadis and reproduced in Appendix C. Table 4.1 summarises the development statistics that apply to the existing approved signage. This Modification Application does not propose any changes to the physical form of the approved signage structure, the hours of operation or the illumination of the signage. These matters are discussed in Sub-Sections 4.3 to 4.4.

The Modification Application does not seek to alter the existing public benefit agreement which is in place. This agreement currently provides Inner West Council with a monetary contribution of \$140,539 per annum plus GST, increasing annually in accordance with the CPI, for the duration of the consent (which would continue through any additional term approved under this Modification Application). The public benefit satisfies the requirements of Clause 3.11 of IESEPP 2021 and Inner West Council's *Policy for the Assessment of Proposals for Outdoor Advertising and Structures in Transport Corridors* (Interim Policy). This is further addressed in Sub-Section 4.5.

TABLE 4.1. SIGNAGE STATISTICS

STATISTICS	WESTERN SIGN	SOUTHERN SIGN
Dimensions of signage	6.1metres height x 22.1 metres in length	6.1 metres height x 170 metres
Height of signage to top of sign	Silos parapet height approximately 50 metres	
Advertising display area	134.8 square metres	1037 square metres
Form of illumination	External – 6 cantilevered down lights	External - 43 cantilevered down lights
Hours of illumination	Night Illumination until 11pm	
Signage Categorisation	General Advertising Roof Sign	

Source: Compiled by Urban Concepts 2025

4.2 The Proposed Modification

This Application seeks to modify DA21/13182. Specifically, this application seeks to modify Conditions A2, A4 and A5 as set out below.

4.2.1 Terms of the Consent - Condition A2

Condition A2 will be modified by updating the previous technical reports submitted with the DA 21/13182 with the new suite of technical reports which have been prepared to support the subject Modification Application.

The approved plans will not change as there are no proposed works to be carried out. For reference, a copy of the approved plans is found in the consent instrument that is reproduced in Appendix C.

The Modification sought to Condition A2 is detailed in Table 4.2 (proposed deletions struck through in red)

TABLE 4.2 CONDITION A2 UPDATED TECHNICAL REPORTS

Design Drawings by Arcadia			
Drawing No.	Issue	Name of Plan	Date
DA.01	1	Existing Signage Elevations and Details	30/06/21

Technical Report	Reference	Author	Date
Statement of Environmental Effects		Urban Concepts (on behalf of Eye Drive Sydney Pty Ltd (a subsidiary company of oOh!media)	27 August 2021 April 2025
Response to Submissions		Urban Concepts (on behalf of Eye Drive Sydney Pty Ltd (a subsidiary company of oOh!media)	18 March 2021
Sign Traffic Safety Assessment	P5182 P6791.002R	Bitzios Consulting	22 June 2021 11 February 2025
Letter of Public Benefit		Eye Drive Sydney Pty Ltd (a subsidiary company of oOh!media)	25 May 2021
Lighting Consultant Advice Letter Lighting Impact Assessment	Rev 1 Ref2823	Electrolight Australia Pty Ltd	3 December 2021 24 February 2025
Light Measurement Report		Electrolight Australia Pty Ltd	16 March 2022
Statement of Heritage Impact		NBRS & Partners Pty Ltd	26 June 2022 13 March 2025
Response to Submissions		NBRS & Partners Pty Ltd	18 March 2022
Ecological Assessment Report		Cumberland Ecology	19 February 2022 21 February 2025
Visual Impact Assessment		Urbis	March 2022 27 March 2025

Source: Compiled by Urban Concepts 2025

The Response to Submissions prepared by Urban Concepts and NBRS on behalf of the Applicant and referred to above may also require updating with new dates pending the outcomes of the public exhibition process. It will be dependent on the receipt of public submissions and/or submissions from any public authorities and referrals to relevant authorities.

4.2.2 Prevailing Documentation - Condition A4

Condition A4 will be amended to remove the typographical reference error and updated to correctly reference Condition A2.

A4. The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in Condition A2 ~~Error! Reference source not found~~ In the event of an inconsistency, ambiguity or conflict between any of the documents listed in Condition A2 ~~Error! Reference source not found~~ the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.

4.2.3 Duration of the Consent – Condition A5

Condition A5 will be modified by extending the duration of the consent by an additional three (3) years.

The Modification sought to Condition A5 by this application is as follows:

A5. This development consent is issued for a limited period of ~~three~~ six years. The consent will cease to be in force/expire ~~three~~ six years after the date of consent.

While Condition A5 reads that the development consent is issued for six (6) years the Modification will only allow the signage to remain in situ for an additional three (3) year period. As detailed below in Sub-Sections 4.3 and 4. 4 no amendments are sought to the signage itself or to the existing lighting elements.

The signage has been located on the Silos structure for the last 32 years. The Glebe Island Silos Signage is categorised as a 'roof advertisement' under the State Environmental Planning Policy (Industry and Employment) 2021 (NSW) (IESEPP). The consent duration is prescribed under the provisions of Chapter 3, Clause 3.19(2) which is reproduced below:

Clause 3.19

2) A consent granted under this Section ceases to be in force --

(a) on the expiration of 10 years after the date on which the consent becomes effective and operates in accordance with Section 83 of the Act, or

(b) if a lesser period is specified by the consent authority, on the expiration of the lesser period.

The proposed three (3) year extension to the consent duration of DA21/13182 is consistent with the maximum ten (10) year consent duration that is prescribed under Clause 3.19 State Environmental Planning Policy (Industry and Employment) 2021 (NSW) .

4.3 Sign Operating Context

Development Application DA 21/13182 permits the display of "general advertising" . Accordingly, both signs display content that is related to third party goods and services. The Glebe Island Silos advertising signage is recognised as being an iconic billboard in the Southern Hemisphere and attracts global attention and advertising expenditure into the Sydney economy from major advertisers and marketers. An advertising display of this scale is referred to by the out of home industry as a 'Landmark' location.

The advertising copy that is displayed is purpose designed for the Silos. This ensures that the content is of high quality and graphic interest. The copy is printed onto vinyl skins that are tensioned across the steel support structure. Advertising space on the Silos structure is sold in twenty-eight (28) day cycles. Both the western and southern signs can be sold separately or purchased by the same advertiser.

The signage structure is inspected monthly when the signage copy is rotated with maintenance as and when required and in accordance with the lease terms.

4.4 Illumination

This Modification Application does not propose any changes to the physical form of the approved signage. The signage is illuminated using directional top mounted floodlights that illuminate the signage face. This Modification Application proposes no changes to the existing illumination of the signage structure. The signage operates on a curfew and is not illuminated between 11pm and 6am.

Electrolight Australia (Electrolight) has undertaken a review of the existing signage lighting and prepared a Lighting Impact Assessment (LIA). This assessment includes a review against all relevant requirements including the Bays West Stage 1 Design Guide and Bays West Stage 1 Master Plan and Urban Design Framework and reports on compliance with the IESEPP, NSW Transport Corridor Advertising and Signage Guidelines 2017 and AS/NZS 4282:2023 Control of the Obtrusive Effects of Outdoor Lighting. Compliance with Schedule 5 of the IESEPP is dealt with in Sub-Section 6.2.2.2 of this SEE. The maximum nighttime luminance of the advertising signs is 58cd/m² which is well below the 200cd/m² that is permissible under AS 4282-23 and the NSW Transport Corridor Advertising and Signage Guidelines 2017.

In addition to the above, Electrolight has reviewed the Bays West documents and has determined that if residential development were to occur within the Southern Development area (known as Site B) within the next three (3) years, the existing luminance of the signage can remain unchanged as it remains compliant with all relevant controls and standards.

The following extract is reproduced from the Electrolight LIA in Appendix H of the SEE and details the lighting impact assessment findings.

5. LUMINANCE ASSESSMENT

The maximum permissible night time luminance of the signage lighting is determined by the existing lighting and land use zoning environment of its surroundings. AS4282 outlines maximum average luminances for different Environmental Zones as shown in Table 1 below:

TABLE 1 - AS4282 MAXIMUM AVERAGE NIGHT TIME LUMINANCE FOR SIGNAGE		
Zone	Description	Max Average Luminance (cd/m ²)
A4	High district brightness e.g. Town and city centres and other commercial areas, residential areas abutting commercial areas, industrial and Port areas and Transport Interchanges	350
A3	Medium district brightness e.g. Suburban areas in towns and cities, generally roadways with streetlighting through suburban, rural or semi-rural areas	250
A2	Low district brightness e.g. Sparsely inhabited rural and semi-rural areas, generally roadways without streetlighting through suburban, rural or semi-rural areas other than intersections	150
A1	Dark e.g. Relatively uninhabited rural areas (including terrestrial, marine, aquatic and coastal areas), generally roadways without streetlighting through rural areas	50
A0	Intrinsically Dark e.g. UNESCO Starlight Reserve, IDA: Dark Sky Parks, Reserves or Sanctuaries, major optical observatories, other accreditations for dark sky places for example astrotourism, heritage value, astronomical importance, wildlife/ecosystem protection, lighting for safe access may be required	0.1

Based on an assessment of the surrounding environment, the signage lighting is located within Environmental Zone A4 under AS4282, therefore, the maximum night time luminance is 350cd/m2.

AS4282 does not include limits for daytime operation of illuminated signage. However, the Transport Guidelines outlines maximum permissible luminance limits for various lighting conditions, including daytime. Under the Transport Guidelines, the signage is classified as being within which is described as an area Zone 3, which is described as an area with generally medium off-street ambient lighting e.g. small to medium shopping/ commercial centres. Under the Guidelines, the maximum night time luminance for illuminated signs within Zone 3, with an area over 10m2, is 200 cd/m2 (taken to be 25% of the maximum daytime limit of 800 cd/m2 as per the previous revision of the Guidelines).

Table 2 below outlines the maximum luminance levels to comply with AS4282 and the Transport Guidelines for the various lighting conditions listed below:

TABLE 2 - MAXIMUM LUMINANCE LEVELS FOR DIGITAL ADVERTISEMENTS		
<i>Lighting Condition</i>	<i>Max Permissible Luminance (cd/m2)</i>	<i>Compliant</i>
Day Time	N/A (OFF)	✓
Night time until 11pm (pre-curfew)	58*	✓
Night time 11pm until 6am (post-curfew)	OFF	✓

* The maximum permissible luminance allowance under AS4282 and the Transport Guidelines is actually 200cd/m2. The luminance level shown above is the existing calculated Luminance of the signage which shall remain unchanged.

It can be seen from Table 2 that should residential development occur within the White Bay Power Station area (Site C of the Bays West Stage 1 Design Guide) within the 3 year consent duration, then the existing luminance of the signage can remain unchanged.

6. AS4282 ASSESSMENT

The signage lighting has been assessed against the lighting criteria and requirements outlined in AS4282.

AS4282 provides limits for different obtrusive factors associated with dark hours (nighttime) operation of outdoor lighting systems. Two sets of limiting values for spill light are given based on whether the lighting is operating before a curfew (known as "pre-curfew" operation) or operating after a curfew (known as post-curfew or curfewed operation). Pre-curfew spill lighting limits are higher than post-curfew values, on the understanding that spill light is more obtrusive late at night when residents are trying to sleep. Under AS4282, the post-curfew period is taken to be between 11pm and 6am daily. As the signage switches off at 11pm, it will be assessed against the pre-curfew limits.

Spill light to any adjacent Environmentally Sensitive Areas are assessed against the more stringent post-curfew limits, as outlined in Clause 3.2.1 of AS4282.

Illuminance Assessment

The AS4282 assessment includes a review of nearby residential dwellings and Environmentally Sensitive Areas and calculation of the amount of vertical illuminance (measured in Lux) that they are likely to receive from the signage during nighttime operation.

The acceptable level of vertical illuminance will in part be determined by the nighttime lighting environment around the dwellings. AS4282 categorises the nighttime environment into different zones with maximum lighting limits as shown in Table 3 below:

TABLE 3 - AS4282 MAXIMUM VALUES OF VERTICAL ILLUMINANCE			
	Max Vertical Illuminance (lx)		Description
	Pre-curfew	Post-curfew	
A4	25	5	High district brightness e.g. Town and city centres and other commercial areas, residential areas abutting commercial areas, industrial and Port areas and Transport Interchanges
A3	10	2	Medium district brightness e.g. Suburban areas in towns and cities, generally roadways with streetlighting through suburban, rural or semi-rural areas
A2	5	1	Low district brightness e.g. Sparsely inhabited rural and semi-rural areas, generally roadways without streetlighting through suburban, rural or semi-rural areas other than intersections
A1	2	0.1	Dark e.g. Relatively uninhabited rural areas (including terrestrial, marine, aquatic and coastal areas), generally roadways without streetlighting through rural areas
A0	0	0	Intrinsically Dark e.g. UNESCO Starlight Reserve, IDA: Dark Sky Parks, Reserves or Sanctuaries, major optical observatories, other accreditations for dark sky places for example astrotourism, heritage value, astronomical importance, wildlife/ecosystem protection, lighting for safe access may be required

Residential Dwellings

Based on an assessment of the surrounding area, the nearest residential dwellings with potential views to the signage are the future dwellings at the following locations:

Address	Zone
Southern Development Blocks	A4
Wedge Development	A4

As such, the future dwellings above will form the focus of the illuminance assessment.

The signage lighting (and surrounding environment) was modelled in lighting calculation program AGI32 to determine the effect (if any) of the light spill from the signage lighting. Photometric data for the luminaires was provided by the lighting manufacturer*. The results of the calculations are shown in Appendix C.

Under AS4282, the maximum allowable illuminance to dwellings in Zone A4 is 25 Lux (as outlined in Table 3). It can be seen from the lighting model that the maximum illuminance to dwellings in Zone A4 is 0.26 lux at Southern Development Blocks.

The signage lighting therefore complies with the relevant illuminance limits for nearby residential dwellings.

Environmentally Sensitive Areas

No Environmentally Sensitive Areas were identified in the vicinity of the signage. The limits in AS4282 therefore do not apply.

Threshold Increment Assessment

The Threshold Increment was also calculated for the traffic on the M4 Western Distributor Freeway (inbound), and the M4 Western Distributor Freeway (inbound). The calculation grids were located at 1.5m above ground level, with a viewing distance of between 10m to 200m from the signage and a windscreen cutoff angle of 20 degrees (as outlined in AS1158). The calculation results show that the Threshold Increment does not exceed 1.86% for any traffic approach (the allowable maximum under the standard is 20%).

Upward Waste Light Assessment

In order to reduce light pollution and associated environmental impacts, AS4282 includes requirements that limit upward waste light into the night sky from signage lighting. AS4282 states that externally illuminated signage shall have an Upward Waste Light Ratio (ULRL) of not more than 0.03. The calculations show that the maximum ULRL of the signage lighting is 0.012 - refer Appendix C. The signage lighting therefore complies with this requirement.

Luminous Intensity

AS4282 nominates Luminous Intensity limits where a light Source: (such as a floodlight) can be directly viewed from a residential dwelling or Environmentally Sensitive Area, as shown in Table 4 below:

TABLE 4 - MAXIMUM LUMINOUS INTENSITIES PER LUMINAIRE FOR EXTERNALLY ILLUMINATED SIGNAGE

<i>Environmental Zone</i>	<i>Non-Curfew L1 luminous intensity (cd)</i>	<i>Non-Curfew L2 luminous intensity (cd)</i>	<i>Curfew luminous intensity (cd)</i>
<i>A4</i>	<i>25000</i>	<i>50000</i>	<i>2500</i>
<i>A3</i>	<i>12500</i>	<i>25000</i>	<i>2500</i>
<i>A2</i>	<i>7500</i>	<i>12500</i>	<i>1000</i>
<i>A1</i>	<i>2500</i>	<i>5000</i>	<i>500</i>
<i>A0</i>	<i>As close to 0 as possible, without impacting safety</i>	<i>As close to 0 as possible, without impacting safety</i>	<i>0</i>

It can be seen from the lighting model that the maximum luminance intensity to dwellings in Zone A4 is 998 cd. The signage lighting therefore complies with the maximum A4 AS4282 luminous intensities limit of 25000 cd for pre-curfew operation.

AS4282 Assessment Summary

It can therefore be seen that the signage complies with all relevant requirements of AS4282.

Source: Electrolight LIA 2025

4.5 Public Benefit Arrangement

In granting consent to DA 21/13182 the consent authority accepted the Public Benefit Offer from the proponent dated 25 May 2021 (which accompanied the Applicants Response to Submissions Addendum dated 19 May 2022). This Public Benefit Agreement satisfied Clause 3.11 of IESEPP 2021 and Council's former Interim Policy, now known as the Policy for the Assessment of Proposals for Outdoor Advertising and Structures in Transport Corridors Policy (adopted 30 April 2019 and updated 21 May 2024). This is dealt with in the development consent instrument under Condition A29. No changes are proposed to this condition.

A29. The Applicant must provide public benefits in accordance with the terms contained in the Public Benefit Offer dated 25 May 2021 (which accompanied the Applicant's RtS Addendum dated 19 May 2022), or such other public benefit as agreed with Inner West Council.

Under the terms of the Public Benefit Agreement the monetary contribution is to be used for heritage conservation works in the Inner West Council Local Government Area. A copy of the agreement is detailed in Appendix G.

As part of this Modification Application the existing Public Benefit Agreement between the Inner West Council and Eye Drive Sydney PTY LTD provides for an annual monetary contribution of \$140,539 plus GST, increasing annually in accordance with the CPI, for the duration of the consent to the Council if the Minister for Planning and Public Spaces (or his delegate) grants consent to the Modification Application.

As part of the determination of DA 21/13182 an additional Public Benefit Condition (A30) was applied to the consent as follows:

A30. The Applicant shall provide interpretation of the history and heritage significance of the Glebe Island Silos, at a public place within the vicinity of the site, to the satisfaction of the Planning Secretary, unless the Applicant can satisfy the Planning Secretary that the Port Authority of NSW has, is or will undertake that work.

The Port Authority is currently undertaking the design and planning of interpretive work.

5. SECTION 4.55(2) ASSESSMENT

5.1 Introduction

The proposal can be determined under Section 4.55(2) of the EP&A Act as it is substantially the same development as that approved under the existing development consent. A copy of legal advice, prepared by Norton Rose Fulbright Australia confirming this position is provided in Appendix B and relevant extracts are reproduced below. In accordance with Section 4.55(3) of the EP&A Act 1979, an assessment of the proposed Modification under Section 4.15(1) of the EP&A Act is contained in Section 6 of this SEE.

5.2 The Requirements of Section 4.55(2)

The following extract is reproduced from Section 4.55(2) of the EP&A Act.

Section 4.55(2) of the EP&A Act provides that:

(2) Other Modifications. A consent authority may, on application being made by the Applicant or any other person entitled to act on a consent granted by the consent authority and subject to and in accordance with the regulations, modify the consent if—

- a. it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which consent was originally granted and before that consent as originally granted was modified (if at all), and*
- b. it has consulted with the relevant Minister, public authority or approval body (within the meaning of Division 4.8) in respect of a condition imposed as a requirement of a concurrence to the consent or in accordance with the general terms of an approval proposed to be granted by the approval body and that Minister, authority or body has not, within 21 days after being consulted, objected to the Modification of that consent, and*
- c. it has notified the application in accordance with—*
 - i. the regulations, if the regulations so require, or*
 - ii. a development control plan, if the consent authority is a council that has made a development control plan that requires the notification or advertising of applications for Modification of a development consent, and*
- d. it has considered any submissions made concerning the proposed Modification within the period prescribed by the regulations or provided by the development control plan, as the case may be.*

Sub-Sections (1) and (1A) do not apply to such a Modification.

5.2.1 Substantially the Same Development

In accordance with Section 4.55(2)(a), the proposed Modification is substantially the same development as that approved with consideration to the following:

- Both the western and southern signs will retain their existing physical appearance in the skyline. There will be no change to the dimensions of the displays, their advertising display area, their height, or orientation.
- There will be no change to light spill, reflectivity or glare generated by the sign when illuminated. Both signs will continue to be illuminated during nighttime hours until 11pm.
- As demonstrated in Section 4 the luminance assessment has confirmed that both signs are fully compliant with the relevant standards and operate well under the maximum thresholds set by these standards.
- The operating context of the signs will remain unchanged, and both will continue to be used to display third party goods and services on a twenty eight (28) day rotation. The advertising copy will continue to be printed on vinyl skins that are tensioned over the steel support structure.
- Maintenance of the signs will continue to occur as and when required and in accordance with the lease term and will utilise the existing steel gantry. This will ensure that the visual quality and aesthetic appearance of the signage display is not diminished during the further three (3) year term.
- The proposed Modification will not alter any aspect of the advertising sign apart from the duration of the consent time for a further three (3) years. Advertising signage has existed on the Silos for over 32 years. A three (3) year extension to the duration of the development consent to a six (6) year duration since the initial consent was issued in 2022 is within the maximum ten (10) year consent duration term prescribed under Clause 3.19 (2) of IESEPP for roof advertisements.
- As there is no material change to the physical fabric of the signs and their operating context the proposed Modification will not result in any significant environmental, economic or social impacts as demonstrated in Section 6 of this SEE.
- Despite changes to the surrounding area, the subject site is still within an active industrial precinct and continues to be zoned as Port and Employment under the Precincts SEPP. The objectives of this zone include facilitating the continuation of commercial port uses and providing a range of commercial port facilities. In granting consent to the signage in 2022 the consent authority accepted that the signage was consistent with the Ports and Employment Zone objectives.

Legal advice provided by Norton Rose Fullbright confirms the proposal satisfies the test and as such the Consent Authority's power under s 4.55(2) of the EP&A Act is enlivened. The Legal Advice is reproduced in Appendix B.

5.2.3 Consultation with The Relevant Minister, Public Authority or Approval Body

The consent authority may modify the consent after satisfying the consultation requirements of Section 4.55(2) (b). The highlighted Section below details the requirements.

(b) it has consulted with the relevant Minister, public authority or approval body (within the meaning of Division 4.8) in respect of a condition imposed as a requirement of a concurrence to the consent or in accordance with the general terms of an approval proposed to be granted by the approval body and that Minister, authority or body has not, within 21 days after being consulted, objected to the Modification of that consent, and

TfNSW did not object to the original proposal and recommended a condition be imposed requiring the sign design, luminance, and sign operation levels are in accordance with the Transport Corridor Outdoor Advertising and Signage Guidelines 2017 and relevant Australian Standards. No changes are proposed to any of these conditions. Heritage NSW did not object to the proposal and advised that the retention of advertising signage on the Glebe Island Silos for an extended period of 10 years would not result in any additional impacts to the heritage values of the Silos or the adjacent State heritage listed White Bay Power Station and Glebe Island Bridge.

These Authorities will be notified of the Modification Application as part of the DPHI's consultation process following the lodgment of the Modification Application.

In addition to the above requirements, a pre-application meeting was held with the DPHI. The minutes of this meeting are reproduced in Appendix D and summarised in sub section 1.4.1.

5.2.4 Notification Process

In accordance with Section 4.55(2)(c), this Application will be notified for a period which is consistent with the timeframes required by the EP&A Act 1979 Regulations. As stated above, the original DA was widely notified including Government Agencies and two (2) Local Government Area Councils being the Inner West and The Council of the City of Sydney, as well as the public.

5.2.5 Consideration of Submissions

In accordance with Section 4.55(2)(d) the Applicant will consider and respond to any relevant submissions made during the public exhibition and lodged within the notification period, as required.

6. SECTION 4.15 (1) ENVIRONMENTAL ASSESSMENT

6.1 Introduction

This Section examines the compliance of the proposal having regard to the relevant Heads of Consideration under Section 4.15 (1) of the EP&A Act 1979. The Heads of Consideration are reproduced below:

*(1) **Matters for consideration—general** In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development the subject of the development application—*

(a) the provisions of—

(i) any environmental planning instrument, and

(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and

(iii) any development control plan, and

(iiia) any planning agreement that has been entered into under Section 7.4, or any draft planning agreement that a developer has offered to enter into under Section 7.4, and

(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph),

(v) (Repealed)

that apply to the land to which the development application relates,

(b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,

(c) the suitability of the site for the development,

(d) any submissions made in accordance with this Act or the regulations,

(e) the public interest.

6.2 Section 4.15 (1)(a) Environmental Planning Instruments, Draft Instruments, DCP's and Planning Agreements.

The relevant Environmental Planning Instruments (EPs) and Development Control Plans (DCPs) that apply to this proposal are as follows:

- State Environmental Planning Policy (Precincts - Eastern Harbour City) 2021 (Refer to Section 6.2.1).
- State Environmental Planning Policy (Industry and Employment) 2021 (Chapter 3, Schedule 5) (Refer to Section 6.2.2).
- Transport Corridor Outdoor Advertising and Signage Guidelines (Refer to Section 6.2.3).
- Glebe Island and White Bay Master Plan 2000 (Refer to Section 6.2.4).
- Glebe Island Silos Advertising Signage Development Control Plan 2004 (Refer to Section 6.2.5).
- Bays West Place Strategy and its supporting plans (Refer to Section 6.2.6).
- State Environmental Planning Policy (Biodiversity and Conservation) 2021. (Refer to Section 6.2.7).

The compliance of the proposal against the relevant provisions follows.

6.2.1 State Environmental Planning Policy (Precincts – Eastern Harbour City) 2021

In 2021 the State Regional Environmental Plan No.26 – City West (SREP 26) was consolidated into State Environmental Planning Policy (Precincts – Eastern Harbour City) 2021 (Precincts SEPP) Chapter 4. The Precincts SEPP sets out planning principles, land use zoning and related objectives. The site is zoned Port and Employment. Pursuant to Clause 4.21 of the Precincts SEPP, only those land uses which are generally consistent with the zone objectives are permissible. Signage has been displayed on the Silos for the past 32 years during which time it has not impacted on the commercial operation of the Port. As indicated in Table 6.1 the display of signage on the Silos is generally consistent with the zone objectives and the proposed Modification does not raise any matters concerning the ongoing permissibility of the use.

Under Clause 4.39, consent cannot be granted for development relating to a heritage item unless the consent authority has considered a Conservation Management Plan or a Heritage Impact Statement which includes an assessment of the impacts on the heritage item. A HIS forms part of this Modification Application and is reproduced in Appendix F of this SEE. An assessment of the heritage impact is detailed in Sub-Section 6.3.7.

TABLE 6.1 COMPLIANCE AND PERMISSIBILITY WITH PORT & EMPLOYMENT ZONE OBJECTIVES

OBJECTIVES	COMMENT	COMPLIANCE
• <i>to facilitate the continuation of commercial port uses, and</i>	<p>The display of advertising on the Silos occurs under a commercial agreement which returns to the Port Authority of NSW a revenue stream that is used to offset the cost of port operations and community environmental programs.</p> <p>In 2004 the NSW DPHI formulated a Development Control Plan to provide a framework against which the ongoing display of signage on the Silos could be assessed. The display of advertising on the Silos has occurred continually over the last 32 years in accordance with a legal and valid consent.</p>	✓
• <i>to allow a range of commercial port facilities (such as buildings, structures, activities or operations and uses ancillary to these, associated with carrying goods from one port to another and associated with storage and handling and access to the port), and</i>	The display of signage on the Silos does not impede the continuation of commercial port uses or the functionality of the Silos. The Silos continue to be used for the storage of gypsum, sugar and sand under commercial lease agreements.	✓
• <i>to encourage development on Glebe Island and land adjoining White Bay which requires close proximity to the port, and</i>	<p>The display of signage does not raise any matters that are inconsistent with this objective. The signage display is sky or roof signage and is elevated above the ground plane. It can be maintained without obstructing or impeding the functionality of the Silos or broader Port operations.</p> <p>The sign is displayed on a purpose-built structure that complies in full with</p>	✓

	the dimensions and placement criteria established by the NSW DPHI for the display of signage on the Silos.	
• to encourage a mix of land uses which generate employment opportunities, particularly in relation to port and maritime uses, and	Commercial third-party advertising is a characterisation of signage and is a land use that is recognised under the EP&A Act. The display of signage on the Silos provides a revenue stream to the Port Authority of NSW which is used to maintain Port operations and to fund a range of community environmental programs. Each of these activities generates employment opportunities.	✓
• to allow a mix of uses which generate employment opportunities in the White Bay Power Station site, and	This is not directly applicable to the subject site, however the ongoing Public Benefit which is provided to the Inner West Council initiates interest in heritage conservation of public assets such as the White Bay Power Station which in turn generates employment opportunities.	✓
• to provide for the ongoing rail access to the port and related activities, and	The proposal is not inconsistent with this objective as it does not raise any transport safety matters that would impact rail access.	✓
• to provide pedestrian and cyclist links with surrounding public access networks, and	The proposal is not inconsistent with this objective as it does not raise any matters that would obstruct pedestrian access and cyclist links.	✓
• to encourage port-related uses which optimise use of existing rail facilities, and	The proposal is not inconsistent with this objective as it does not raise any transport safety matters that would impact rail access.	✓
• to provide road and rail access to port activities.	The proposal is not inconsistent with this objective as it does not raise any transport safety matters that would impact road and rail access.	✓

Source: Compiled by Urban Concepts 2025

6.2.2 State Environment Planning Policy (Industry and Employment) 2021

The previous State Environmental Planning Policy No. 64 Advertising and Signage (SEPP 64) was gazetted on the 16 March 2001. In 2021 SEPP 64 was consolidated into Chapter 3 and Schedule 5 of the State Environment Planning Policy (Industry and Employment) 2021 (IESEPP). IESEPP Chapter 3 and Schedule 5 include a comprehensive range of provisions to ensure that advertising and signage is well located, compatible with the desired amenity of an area and is of a high quality and finish. Chapter 3 and Schedule 5 do not regulate the content of signs.

Chapter 3 and Schedule 5 apply to building and business identification signage, advertisements that advertise or promote any goods, services or events and any structure that is used for the display of signage that is permitted under another Environmental Planning Instrument.

The Transport Corridor Outdoor Advertising and Signage Guidelines 2017 (hereafter referred to as the Transport Corridor Guidelines 2017) apply to this application as the proposal is categorised as a roof advertisement. In this regard the luminance, road safety and public benefit provisions contained in the Transport Corridor Guidelines apply to this proposal.

An assessment of the proposal against the relevant provisions of Chapter 3 and Schedule 5 IESEPP and the Transport Corridor Advertising and Signage Guidelines 2017 follows:

- Section 6.2.2.1 An assessment of the proposal against the relevant provisions of Chapter 3 IESEPP.
- Section 6.2.2.2 An assessment of the proposal against the Schedule 5 Assessment Criteria of IESEPP.
- Section 6.2.3 An assessment of the proposal against the Transport Corridor Guidelines 2017.

6.2.2.1 ASSESSMENT OF THE PROPOSAL AGAINST IESEPP CHAPTER 3

TABLE 6.2 COMPLIANCE WITH IESEPP CHAPTER 3

SEPP (INDUSTRY AND EMPLOYMENT) 2021	COMMENT	COMPLIANCE
Chapter 3 Advertising and signage		
Part 3.1 Preliminary		
3.1 Aims, objectives etc		
(1) <i>This Chapter aims—</i>		YES
(a) <i>to ensure that signage (including advertising)—</i>	The Modification proposes no change to the physical form of the advertisements that are currently displayed on the Silos. The advertisements comply in full with the design guidelines that were established for the Silos under the Glebe Island Advertising DCP 2004. The DCP specifically states that it provides for the continued display of advertising on the Silos in a manner that is respectful of its heritage significance and the maritime industrial use of the Glebe Island.	
(i) <i>is compatible with the desired amenity and visual character of an area, and</i>		
(ii) <i>provides effective communication in suitable locations, and</i>		
(iii) <i>is of high quality design and finish, and</i>		
(b) <i>to regulate signage (but not content) under Part 4 of the Act, and</i>		
(c) <i>to provide time-limited consents for the display of certain advertisements, and</i>		
(d) <i>to regulate the display of advertisements in transport corridors, and</i>		
(e) <i>to ensure that public benefits may be derived from advertising in and adjacent to transport corridors.</i>		
(2) <i>This Chapter does not regulate the content of signage and does not require consent for a change in the</i>	The Modification seeks a further three (3) year term to the existing consent duration in line with the Glebe Island Advertising DCP 2004. The Stage 1 Rezoning and Master Plan 2022 has a development timeline of 5-8 years. The three-year (3) extension being sought to the consent does not coincide with this development timeline. Extending the consent duration will not adversely impact desired visual character and amenity of the surrounding locality.	
	The existing Public Benefit arrangement which comprises an annual monetary contribution to the Inner West Council to facilitate heritage conservation interpretation within the Glebe Island and White Bay locality and the broader local area will continue to be provided to the Inner West Council.	

3.2 Definitions

<i>(1) In this Chapter—</i> Advertisement means signage to which Part 3.3 applies and includes any advertising structure for the advertisement.	The proposal is an advertisement as it displays third party content. Part 3.3 of Chapter 3 applies to the Application.	YES
advertising display area means, subject to subsection (2), the area of an advertisement or advertising structure used for signage, and includes any borders of, or surrounds to, the advertisement or advertising structure, but does not include safety devices, platforms or lighting devices associated with advertisements or advertising structures.	The western advertisement has an existing advertising display area of 134.8 square metres. The southern advertisement has an advertising display area of 1037 square metres. The advertising display areas do not change because of this Application.	
advertising structure means a structure or vessel that is principally designed for, or that is used for, the display of an advertisement.	The advertising structure is purpose designed to display advertisements.	YES
classified road means a road classified under Part 5 of the Roads Act 1993 .	The Western Distributor is a classified road. The advertisements are located within 250 metres of a classified road and as such the Application will be referred to TfNSW.	YES
consent authority means the consent authority determined in accordance with Section 3.10.	The NSW Minister for Planning and Public Spaces is the consent authority for this Application.	YES
Guidelines means the provisions of the publication titled Transport Corridor Outdoor Advertising and Signage Guidelines approved by the Minister for the purposes of this Chapter and published in the Gazette on the date on which State Environmental Planning Policy No 64—Advertising and Signage (Amendment No 3) is published on the NSW legislation website.	Noted. An assessment of the signage against the relevant luminance and road safety provisions contained in the Transport Corridor Guidelines 2017 is detailed in the SEE. This is detailed in the LIA at Appendix H and the TSA at Appendix I.	YES
roof or sky advertisement means an advertisement that is displayed on, or erected on or above, the parapet or eaves of a building	The existing advertisements are roof advertisements as they are displayed on the upper parapet of the Silos structure. Clause 3.19 will apply to this Application.	YES
Signage means all signs, notices, devices, representations and advertisements that advertise or promote any goods services or events and any structure or vessel that is principally designed for, or that is used for, the display of signage and includes— a) building identification signs, and b) business identification signs, and c) advertisements to which Part 3.3 applies, but does not include traffic signs or traffic control facilities.	The existing signage constitutes an advertisement to which Part 3.3 applies.	YES

TfNSW means Transport for NSW constituted under the Transport Administration Act 1988 .	The advertisements are located within 250 metres of a classified road. As the Minister for Planning and Public Spaces is the consent authority the Application will be referred to TfNSW.	YES
3.3 Area of application of this Chapter		
(1) This Chapter applies to the whole of the State.	This Chapter applies to this Application.	YES
(2) Without limiting Sub-Section (1), this Chapter applies to all land and structures within the State and all vessels on navigable waters.		
(3) Despite Sub-Section (1), this Chapter does not apply to the following land— Land to which State Environmental Planning Policy (Precincts—Regional) 2021 , Chapter 4 applies Land to which State Environmental Planning Policy (Western Sydney Parklands) 2009 applies		
3.4 Signage to which this Chapter applies		
(1) This Chapter applies to all signage that— (a) can be displayed with or without development consent under another environmental planning instrument that applies to the signage, and (b) is visible from any public place or public reserve, except as provided by this Chapter. Note— Public place and public reserve are defined in Section 4(1) of the Act to have the same meanings as in the Local Government Act 1993 .	The existing signage is visible from a public place as defined under the Local Government Act 1993. Advertisements are a use that is permissible on the site with consent.	YES
(2) This Chapter does not apply to signage that, or the display of which, is exempt development under an environmental planning instrument that applies to it, or that is exempt development under this Chapter.		
3.5 Relationship with other environmental planning instruments		
In the event of an inconsistency between this Chapter and another environmental planning instrument, whether made before or after this Chapter, this Chapter prevails to the extent of the inconsistency. Note— This Chapter will have the effect of modifying, and having paramountcy over, the provisions of some other environmental planning instruments that permit the display of signage with or without development consent. This is particularly so in the case of large advertisements, being advertisements of the kind referred to in Part 3.3. This Chapter (other than Section 3.14) will not override a prohibition on the display of	Noted.	YES

signage that is contained in another environmental planning instrument. Because of some provisions, such as Sections 3.8 and 3.19, it may add prohibitions on advertising if the advertising is proposed to be displayed in certain circumstances, such as on environmentally sensitive or environmentally significant land or in the form of a roof or sky advertisement.

PART 3.2 - SIGNAGE GENERALLY

3.6 Granting of consent to signage

A consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied—
 (a) that the signage is consistent with the objectives of this Chapter as set out in Section 3.1(1)(a), and
 (b) that the signage the subject of the application satisfies the assessment criteria specified in Schedule 5.

Based on our assessment it is our professional opinion that the proposal is consistent with the objectives of Chapter 3 and satisfies the Schedule 5 Assessment Criteria. Refer Table 6.2 for Schedule 5 Assessment.

YES

PART 3.3 – ADVERTISEMENTS

DIVISION 1 GENERAL

3.7 Advertisements to which this Part applies

(1) This Part applies to all signage to which this Chapter applies, other than the following—

The existing signs on the Silos are defined as advertisements to which Part 3.3 applies.

YES

- a. business identification signs,
- b. building identification signs,
- c. signage that, or the display of which, is exempt development under an environmental planning instrument that applies to it,
- d. signage on vehicles.

(2) Despite Subsection (1)(d), Section 3.26 applies to signage on a trailer (within the meaning of the [Road Transport Act 2013](#)).

3.8 Prohibited advertisements

(1) Despite the provisions of any other environmental planning instrument, the display of an advertisement is prohibited on land that, under an environmental planning instrument, is within any of the following zones or descriptions:

- environmentally sensitive area
- heritage area (excluding railway stations)
- natural or other conservation area

The Silos are not within a heritage zone or heritage conservation area. The Silos are identified in Schedule 4 of the Precincts SEPP as being heritage items within the Bays Precinct. A HIS prepared by NBRs accompanies this Application and is in Appendix F.

YES

- open space
- waterway
- residential (but not including a mixed residential and business zone, or similar zones)
- scenic protection area
- national park
- nature reserve

(2) This Section does not apply to the following—

- a) the Mount Panorama Precinct,
- b) the display of an advertisement at a public sporting facility situated on land zoned public recreation under an environmental planning instrument, being an advertisement that provides information about the sponsors of the teams or organisations using the sporting facility or about the products of those sponsors.

DIVISON 2 – CONTROL OF ADVERTISEMENTS

3.9 Requirement for consent

A person must not display an advertisement, except with the consent of the consent authority or except as otherwise provided by this Chapter.

Noted. This Application seeks consent to continue the existing display of advertising on the Silos for a further three (3) year term.

YES

3.10 Consent Authority

For the purposes of this Chapter, the consent authority is—

- a) the council of a local government area in the case of an advertisement displayed in the local government area (unless paragraph (c), (d) or (e) applies), or
- b) TfNSW in the case of an advertisement displayed on a vessel, or
- c) the Minister for Planning in the case of an advertisement displayed by or on behalf of RailCorp, NSW Trains, Sydney Trains, Sydney Metro or TfNSW on a railway corridor, or
- d) the Minister for Planning in the case of an advertisement

The Minister for Planning and Public Space is the consent authority for the application in accordance with Clause 2.8(4) of the Precincts SEPP.

YES

displayed by or on behalf of RMS
on—

- I. a road that is a freeway or tollway (under the [Roads Act 1993](#)) or associated road use land that is adjacent to such a road, or
- II. a bridge constructed by or on behalf of TfNSW on any road corridor, or
- III. land that is owned, occupied or managed by TfNSW, or
- e) the Minister for Planning in the case of an advertisement displayed on transport corridor land comprising a road known as the Sydney Harbour Tunnel, the Eastern Distributor, the M2 Motorway, the M4 Motorway, the M5 Motorway, the M7 Motorway, the Cross City Tunnel or the Lane Cove Tunnel, or associated road use land that is adjacent to such a road.

3.11 Matters for considerations

(1) A consent authority (other than in a case to which Sub-Section (2) applies) must not grant consent to an application to display an advertisement to which this Chapter applies unless the advertisement or the advertising structure, as the case requires—

- a) is consistent with the objectives of this Chapter as set out in Section 3.1(1)(a), and
- b) has been assessed by the consent authority in accordance with the assessment criteria in Schedule 5 and the consent authority is satisfied that the proposal is acceptable in terms of its impacts, and
- c) satisfies any other relevant requirements of this Chapter.

(2) If the Minister for Planning is the consent authority or Section 3.16 or 3.22 applies to the case, the consent authority must not grant consent to an application to display an advertisement to which this Chapter applies unless the advertisement

The proposal is consistent with the objectives that are contained in clause 3.1(1) (a).

In our professional opinion, the proposal satisfies the Schedule 5 Assessment Criteria as detailed in Table 6.2.

Independent and robust investigations have confirmed that the proposal satisfies the traffic safety and luminance provisions contained in the Transport Corridor Guidelines 2017. This is detailed in the LIA at Appendix H and the TSA at Appendix I.

The modified development will continue to deliver a Public Benefit to the Inner West Council in the form of an annual monetary contribution which is to be used to facilitate local heritage conservation interpretation.

YES

or the advertising structure, as the case requires—

- a) *is consistent with the objectives of this Chapter as set out in Section 3.1(1)(a), and*
- b) *has been assessed by the consent authority in accordance with the assessment criteria in Schedule 5 and in the Guidelines and the consent authority is satisfied that the proposal is acceptable in terms of—*
 - i. *design, and*
 - ii. *road safety, and*
 - iii. *the public benefits to be provided in connection with the display of the advertisement, and*
- c) *satisfies any other relevant requirements of this Chapter.*

(3) In addition, if Section 3.16 or 3.22 applies to the case, the consent authority must not grant consent unless arrangements that are consistent with the Guidelines have been entered into for the provision of the public benefits to be provided in connection with the display of the advertisement.

3.12 Duration of consents

(1) <i>A consent granted under this Part ceases to be in force—</i>	Clause 3.19 specifies a maximum 10-year consent term for a roof or sky advertisement.	YES
a) <i>on the expiration of 15 years after the date on which the consent becomes effective and operates in accordance with Section 83 of the Act, or</i>	Extending the existing consent for a further three (3) year term making the full consent term six (6) years, is consistent with the ten-year maximum consent term specified under Clause 3.19 of this Chapter.	
b) <i>if a lesser period is specified by the consent authority, on the expiration of the lesser period.</i>		
(2) <i>The consent authority may specify a period of less than 15 years only if—</i>		
a) <i>before the commencement of this Part, the consent authority had adopted a policy of granting consents in relation to applications to display advertisements for a lesser period and the duration of the consent specified by the</i>		

- consent authority is consistent with that policy, or
- b) the area in which the advertisement is to be displayed is undergoing change in accordance with an environmental planning instrument that aims to change the nature and character of development and, in the opinion of the consent authority, the proposed advertisement would be inconsistent with that change, or
- c) the specification of a lesser period is required by another provision of this Chapter.

DIVISION 3 – PARTICULAR ADVERTISEMENTS

3.15 Advertisements with display area greater than 20 square metres or higher than 8 metres above ground

(1) This Section applies to an advertisement—	This clause applies to the Application as the existing advertisements have display areas greater than 20 square metres and are higher than 8 metres above ground.	YES
<p>a) that has a display area greater than 20 square metres, or</p> <p>b) that is higher than 8 metres above the ground.</p>		
(2) The consent authority must not grant consent to an application to display an advertisement to which this Section applies unless—	Table 6.2 provides an assessment of the proposal against the Schedule 5 Assessment Criteria.	
<p>a) the Applicant has provided the consent authority with an impact statement that addresses the assessment criteria in Schedule 5 and the consent authority is satisfied that the proposal is acceptable in terms of its impacts, and</p> <p>b) the consent authority gave a copy of the application to TfNSW before the application is exhibited if the application is an application for the display of an advertisement to which Section 3.16 applies.</p>	Clause 3.16 does not apply to the Application as the Minister for Planning and Public Spaces is the consent authority for this Application.	

3.16 Advertisements greater than 20 square metres and within 250 metres of, and visible from, a classified road

(1) This Section applies to the display of an advertisement to which Section 3.15 applies, that is within 250 metres of a classified road any part of which is visible from the classified road.	Noted. The Minister for Planning and Public Spaces is the consent authority for the Application in accordance with Clause 2.8(4) of the Precincts SEPP. This Clause does not apply.	YES
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(2) *The consent authority must not grant development consent to the display of an advertisement to which this Section applies without the concurrence of TfNSW.*

(3) *In deciding whether or not concurrence should be granted, TfNSW must take into consideration—*

- a) *the impact of the display of the advertisement on traffic safety, and*
- b) *the Guidelines.*

(4) *If TfNSW has not informed the consent authority within 21 days after the copy of the application is given to it under Section 3.15(2)(b) that it has granted, or has declined to grant, its concurrence, TfNSW is taken to have granted its concurrence.*

(5) *Nothing in this Section affects Section 3.14.*

(6) *This Section does not apply when the Minister for Planning is the consent authority.*

3.17 Advertising display area greater than 45 square metres

The consent authority must not grant consent to the display of an advertisement with an advertising display area greater than 45 square metres unless—

- a) *a development control plan is in force that has been prepared on the basis of an advertising design analysis for the relevant area or precinct, or*
- b) *in the case of the display of an advertisement on transport corridor land, the consent authority is satisfied that the advertisement is consistent with the Guidelines.*

The Glebe Island Advertising Signage DCP 2004 was adopted in December 2004. The DCP has been made having regard to the provisions of the repealed SEPP 64 now IESEPP.

YES

The signage that is currently displayed on the Silos complies with the signage dimensions and advertising display area that are contained in the DCP.

3.18 Location of certain names and logos

(1) *The name or logo of the person who owns or leases an advertisement or advertising structure may appear only within the advertising display area.*

(2) *If the advertising display area has no border or surrounds, any such name or logo is to be located—*

- a) *within the advertisement, or*

The logo of the advertisement operator is located on the signage face of each elevation.

YES

- b) *within a strip below the advertisement that extends for the full width of the advertisement.*

(3) *The area of any such name or logo must not be greater than 0.25 square metres.*

(4) *The area of any such strip is to be included in calculating the size of the advertising display area.*

3.19 Roof or sky advertisements

1) <i>The consent authority may grant consent to a roof or sky advertisement only if—</i>	The proposal seeks to continue the display of the existing signage for a further three (3) year term in its current location.	YES
<p>a) <i>the consent authority is satisfied—</i></p> <p>(i) <i>that the advertisement replaces one or more existing roof or sky advertisements and that the advertisement improves the visual amenity of the locality in which it is displayed, or</i></p> <p>(ii) <i>that the advertisement improves the finish and appearance of the building and the streetscape, and</i></p>	<p>The existing signage does not extend above the upper parapet of the Silos structure and the width of both the western and the southern signs is no wider than the Silos structure.</p> <p>The Glebe Island Silos Advertising DCP 2004 was adopted in December 2004 and is still in force.</p>	
<p>b) <i>the advertisement—</i></p> <p>(i) <i>is no higher than the highest point of any part of the building that is above the building parapet (including that part of the building (if any) that houses any plant but excluding flag poles, aerials, masts and the like), and</i></p> <p>(ii) <i>is no wider than any such part, and</i></p>	<p>When approved, the consent authority applied a term of less than 10 years due to the changing land uses envisaged under strategic planning documents already in place in the vicinity of the Silos. This Modification Application seeks an extension to the duration of the existing three (3) year consent for an additional three (3) years. If approved the six (6) year term is well within the maximum ten (10) year term provided by this clause. Further, the DPHI has acknowledged that there is little or no likelihood of new residential development occurring within the recently approved Stage 1 Rezoning and Master Plan within the next three (3) years.</p>	
c) <i>a development control plan is in force that has been prepared on the basis of an advertising design analysis for the relevant area or precinct and the display of the</i>		

advertisement is consistent with the development control plan.

(2) A consent granted under this Section ceases to be in force—

- a) on the expiration of 10 years after the date on which the consent becomes effective and operates in accordance with Section 83 of the Act, or*
- b) if a lesser period is specified by the consent authority, on the expiration of the lesser period.*

(3) The consent authority may specify a period of less than 10 years only if—

- a) before the commencement of this Part, the consent authority had adopted a policy of granting consents in relation to applications to display advertisements for a lesser period and the duration of the consent specified by the consent authority is consistent with that policy, or*
- b) the area is undergoing change in accordance with an environmental planning instrument that aims to change the nature and character of development and, in the opinion of the consent authority, the proposed roof or sky advertisement would be inconsistent with that change.*

Source: Compiled by Urban Concepts 2025

6.2.2.2 ASSESSMENT OF THE PROPOSAL AGAINST IESEPP SCHEDULE 5 ASSESSMENT CRITERIA

TABLE 6.3 COMPLIANCE WITH IESEPP SCHEDULE 5 ASSESSMENT CRITERIA

SEPP (INDUSTRY AND EMPLOYMENT) 2021	COMMENT	COMPLIANCE
SCHEDULE 5 ASSESSMENT CRITERIA		
1. Character of the area		
<ul style="list-style-type: none"> Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located? 	<p>The strategic land use role that the Port plays and will continue to play over the coming decade and beyond supporting the State's construction activities through the storage and supply sand, cement and aggregates is resulting in the intensification of Port facilities.</p> <p>Recent approvals have been issued for a multi-user facility adjacent to the eastern shipping berth and Hanson Construction Materials Pty Ltd has received a State Significant Development Approval for an aggregate handling facility and concrete batching plant adjacent to the Glebe Island Silos and Glebe Island Berth 1. The proposal to extend the duration of the signage display for another three (3) year term will not impede the operation of these port facilities or detract from the character of Glebe Island as a working port.</p> <p>While the Stage 1 Rezoning and Master Plan for the Sub-Precinct was approved in December 2022, there is little or no likelihood of new residential development being in place within the next three (3) years. Robust lighting, traffic safety, ecology, heritage and visual impact assessments have determined that the ongoing display of the existing signage for another three (3) years continues to be appropriate.</p> <p>The urban renewal opportunities presented by the Bays West Place Strategy for the Sub Precincts 2-10 are expected to progress after 2030 which is after the three (3) year term.</p>	YES
<ul style="list-style-type: none"> Is the proposal consistent with a particular theme for outdoor advertising in the area or locality? 	<p>The Glebe Island Silos have consistently displayed large format advertising signage since 1992. The scale of the signage makes it an iconic landmark advertising display. Dimensions, location and orientation of the signage display are consistent with the development standards that were adopted in the Glebe Island Advertising DCP 2004. Robust lighting, traffic safety, heritage, ecological and visual impact assessments have determined that the design and of the existing signage remains appropriate to the locality and can continue without adverse impact.</p>	YES
2. Special Areas		

<ul style="list-style-type: none"> • Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas? 	<p>The Silos are identified in Chapter 4, Division 6 of the Precincts SEPP as being a heritage item within the Bays Precinct. A HIS accompanies this application and is reproduced in Appendix F.</p> <p>NBRS has confirmed that the display of advertising on the Silos has been undertaken in accordance with the principles for the adaptive reuse of heritage items. The signage display is confined to the roof parapet of the southern and western elevations only. This ensures that the northern and eastern elevations are retained in their original state and as a complete operating structure with distinguishable component parts such as the conveyor arm and eastern tower.</p>	YES
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3. Views and Vistas

<ul style="list-style-type: none"> • Does the proposal obscure or compromise important views? • Does the proposal dominate the skyline and reduce the quality of vistas 	<p>Urbis has undertaken a Visual Impact Assessment (VIA) to identify the viewing catchment and the impact the signage has on the viewing locations. The VIA is reproduced in Appendix E. The VIA used 14 views which are a representative sample of the likely views and compositions available from across the wider potential visual catchment. The VIA has concluded that:</p>	YES
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'In all cases the existing signage generates a low level of visual effects on view composition, visual character, visual resources of the site (the heritage item itself and its industrial maritime setting). The existing signage does not create any view blocking or view loss effects.'

In our opinion, the existing level of visual effects and impacts generated by the existing signage are reasonable and acceptable and as such the proposed s4.55 Modification application to retain the existing situation for an additional three (3) years is supported.'

<ul style="list-style-type: none"> • Does the proposal respect the viewing rights of other advertisers? 	<p>The signage sits within the Silos building envelope. It is an iconic landmark structure. It does not obscure or diminish the viewing rights of other signage and does not impede views past the structure.</p>	YES
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4. Streetscape, setting or landscape

<ul style="list-style-type: none"> • Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape? 	<p>The signage complies with the design principles that are embodied within the Glebe Island Advertising DCP 2004 and complies with the dimensions that are prescribed for the signage display in the DCP as illustrated in Figure 6.3C.</p>	YES
<ul style="list-style-type: none"> • Does the proposal contribute to the visual interest of the streetscape, setting or landscape? 	<p>The Glebe Island Silos Signage is recognised as one of the Southern Hemisphere's most iconic billboards, and attracts global attention and advertising spend into the Sydney</p>	YES

	economy from major advertisers and marketers. An advertising display of this scale is referred to by the out of home industry as a 'Landmark' location. The advertising copy that is generated for these companies is purpose designed for the Silos. This ensures that the content is of high quality and graphic interest.	
• Does the proposal reduce clutter by rationalising and simplifying existing advertising?	The proposal does not increase the number of signs displayed on the Silos structure. The proposal is only seeking a further three (3) year term for the consent duration.	YES
• Does the proposal screen unsightliness?	The signs are located on the western and southern parapets. This ensures that the northern and eastern elevations are retained in their original state and as a complete operating structure.	YES
• Does the proposal protrude above buildings, structures or tree canopies in the area or locality?	The existing advertising displays are fully contained within the profile of the western and southern building envelope of the Silos structure. The signs do not extend above the parapet of the Silos structure. This Modification Application proposes no change to the existing signage that would alter its physical presence in the skyline.	YES
• Does the proposal require ongoing vegetation management?	The proposal raises no vegetation management concerns.	YES
5. Site Building		
• Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located?	The signage complies with the design principles that are embodied within the Glebe Island Advertising DCP 2004 and complies with the dimensions that are prescribed for the signage display under the DCP as illustrated at Figure 6.3C.	YES
• Does the proposal respect important features of the site or building, or both?	The display of advertising on the Silos respects the heritage significance of the Silos structure and has been undertaken in accordance with the principles for the adaptive reuse of heritage items. The signage display is confined to the roof parapet of the southern and western elevations only.	YES
• Does the proposal show innovation and imagination in its relationship to the site or building, or both?	The existing structure is comprised of durable outdoor materials which are suited to the industrial context of Glebe Island as a working port. The advertising copy that is displayed is purpose designed for the Silos given its landmark dimensions. This ensures that the content is of high quality and graphic interest.	YES

No change is proposed to the advertising display by this Application that would diminish the high graphic quality of the graphic content that will be displayed on the structures over the next three (3) year term.

The proposal incorporates a monetary contribution to satisfy the Public Benefit

provisions of Chapter 3 IESEPP. This is already in place under an existing Voluntary Planning Agreement that was executed for the current development consent and pending the approval of this Application it will stay in place and the contribution will continue to be paid to the Inner West Council to facilitate local heritage conservation interpretation.

6. Associated devices and logos with advertisements and advertising structures

<ul style="list-style-type: none"> • Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed? 	The existing maintenance gantry walkways will be retained. These structures are hidden from the view behind the signage face	YES
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7. Illumination

<ul style="list-style-type: none"> • Would illumination result in unacceptable glare? • Would illumination affect safety for pedestrians, vehicles or aircraft? • Would illumination detract from the amenity of any residence or other form of accommodation? • Can the intensity of the illumination be adjusted, if necessary? • Is the illumination subject to a curfew? 	<p>Electrolight Australia has undertaken a LIA to ascertain whether the existing illumination levels of the signage display comply with the relevant controls for its curfewed operation. The LIA is reproduced at Appendix H. This assessment has concluded that the current lighting is well below the requirements of the Transport Corridor Guidelines 2017 and AS 4282-2023 which both specify a maximum nighttime luminance of 200cd/m². The sign operates at 58cd/m² which is well below the allowable limit.</p> <p>The existing signage complies with all relevant requirements of AS 4282-2023 Control of the Obtrusive Effects of Outdoor Lighting, the Transport Corridor Guidelines 2017 and Chapter 3 and Schedule 5 IESEPP provisions. In complying with these provisions, the signage will not result in unacceptable glare nor will it adversely impact the safety of pedestrians, residents or vehicular traffic. The signage will also not cause any reduction in visual amenity to nearby residences or accommodation.</p>	YES
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8. Safety

<ul style="list-style-type: none"> • Would the proposal reduce the safety for any public road? • Would the proposal reduce the safety for pedestrians or bicyclists? • Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas? 	Bitzios Consulting has undertaken a TSA which is reproduced in Appendix I. The existing signs been assessed for compliance against various planning policies and traffic safety assessment criteria and are found to be fully compliant. Furthermore, a first principles assessment suggests that retaining the signs will result in no appreciable change in traffic safety risk in the area.	YES
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Source: Compiled by Urban Concepts 2025

6.2.3 Statutory Compliance with Transport Corridor Outdoor Advertising and Signage Guidelines 2017

The Transport Corridor Advertising and Signage Guidelines 2017 (Transport Corridor Guidelines 2017) incorporate specific traffic safety and illumination criteria to ensure the safe and effective operation of advertising signs. The compliance of the proposal against these criteria is discussed below.

6.2.3.1 TRAFFIC SAFETY

The Bitzios Consulting has undertaken a Traffic Safety Assessment (TSA) of the signage to ascertain its compliance with the Transport Corridor Guidelines 2017. The results of this assessment are reproduced in Table 6.4. The assessment demonstrates that the existing signage display complies in full with the traffic safety criteria. The Bitzios TSA Report is reproduced in Appendix I.

TABLE 6.4 TRANSPORT CORRIDOR OUTDOOR ADVERTISING AND SIGNAGE GUIDELINES 2017 TRAFFIC SAFETY PROVISIONS

Criteria	Criteria Requirement	Response
Road Clearance		
a	<p>The advertisement must not create a physical obstruction or hazard. For example:</p> <p>i. Does the sign obstruct the movement of pedestrians or bicycle riders? (e.g. telephone kiosks and other street furniture along roads and footpath areas)?</p> <p>ii. Does the sign protrude below a bridge or other structure so it could be hit by trucks or other tall vehicles? Will the clearance between the road surface and the bottom of the sign meet appropriate road standards for that particular road?</p> <p>iii. Does the sign protrude laterally into the transport corridor so it could be hit by trucks or wide vehicles?</p>	<p>The signs do not obstruct the movement of pedestrians or bicycle riders or protrude laterally into the transport corridor given they are located high on the building.</p>
Line of Sight		
a	<p>An advertisement must not obstruct the driver's view of the road particularly of other vehicles, bicycle riders or pedestrians at crossings</p>	<p>The advertisements do not obstruct the driver's view of the road, other vehicles, bicycle riders or pedestrians at crossings or direct a driver's attention away from the road because momentary glance to the signs are in the same forward view as vehicles ahead.</p>
b	<p>An advertisement must not obstruct a pedestrian or cyclist's view of the road</p>	<p>The advertisements do not obstruct a pedestrian or cyclist's view of the road given they are located high above the road.</p>
c	<p>The advertisement should not be located in a position that has the potential to give</p>	<p>The advertisements are deemed not to be located in a position that has the</p>

	<p>incorrect information on the alignment of the road. In this context, the location and arrangement of signs' structures should not give visual clues to the driver suggesting that the road alignment is different to the actual alignment. An accurate photomontage should be used to assess this issue.</p>	<p>potential to give incorrect information on the road alignment. Day and night-time photo montages showing key approaches to the site are provided in Appendix I.</p>
d	<p>The advertisement should not distract a driver's attention away from the road environment for an extended length of time. For example:</p> <ul style="list-style-type: none"> i. Does the sign obstruct the movement of pedestrians or bicycle riders? (e.g. telephone kiosks and other street furniture along roads and footpath areas)? ii. The sign should not be located in such a way that the driver's head is required to turn away from the road and the components of the traffic stream in order to view its display and/or message. All drivers should still be able to see the road when viewing the sign, as well as the main components of the traffic stream in peripheral view. 	<p>The proposed advertisement will not obstruct movement of pedestrians or bicycle riders given they are located high on the building. The sign is located and orientated so that only glance appreciation is likely, meaning drivers would not need to turn directly in the ordinary forward view. In any case, drivers would not be motivated to do so.</p> <p>Given that the signs are directly in the forward (but distant) view, drivers would still instantly recognise and react to light, movement or colour ahead such as vehicles changing lanes or braking ahead of them, as they do now.</p>
e	<p>The sign should be oriented in a manner that does not create headlight reflections in the driver's line of sight. As a guideline, angling a sign five degrees away from right angles to the driver's line of sight can minimise headlight reflections. On a curved road alignment, this should be checked for the distance measured back from the sign that a car would travel in 2.5 seconds at the design speed.</p>	<p>The advertisements do not create headlight reflections in the driver's line of sight given their raised locations and they will not tilt down towards them.</p>
Proximity to decision making points and conflict points		
a	<p>The sign should not be located:</p> <ul style="list-style-type: none"> i. less than the safe sight distance from an intersection, merge point, exit ramp, traffic control signal or sharp curves ii. less than the safe stopping sight distance from a marked foot crossing, pedestrian crossing, pedestrian refuge, cycle crossing, cycleway facility or hazard within the road environment iii. so that it is visible from the stem of a T-intersection. 	<p>The western elevation sign is located at more than the safe sight distance from the Victoria Road eastbound merge point (approximately 400m).</p>

b	<p>The placement of a sign should not distract a driver at a critical time. In particular, signs should not obstruct a driver's view:</p> <ul style="list-style-type: none"> i. of a road hazard ii. to an intersection iii. to a prescribed traffic control device (such as traffic signals, stop or give way signs or warning signs) iv. to an emergency vehicle access point or Type driveways (wider than 6-9m) or higher. 	<p>The signs are not placed where they could distract a driver at a critical time as there are no intersections, nor do they obstruct a driver's view of traffic control devices given their raised locations.</p>
Advertising signage and traffic control devices		
a	<p>The advertisement must not distract a driver from, obstruct or reduce the visibility and effectiveness of, directional signs, traffic signals, prescribed traffic control devices, regulatory signs or advisory signs or obscure information about the road alignment,</p>	<p>The advertisements do not distract a driver from or reduce the visibility and effectiveness of directional signs, traffic signals, other traffic control devices, regulatory signs or advisory signs or obscure information about the road alignment given their raised locations.</p>
b	<p>The advertisement must not interfere with stopping sight distance for the road's design speed or the effectiveness of a traffic control device. For example:</p> <ul style="list-style-type: none"> I. Could the advertisement be construed as giving instructions to traffic such as 'Stop' or imitate a traffic control device? II. If the sign is in the vicinity of traffic lights, does the advertisement use red, amber or green circles, octagons, crosses or triangles or shapes or patterns that may result in the advertisement being mistaken for a traffic signals 	<p>Condition B1 of the development consent states that the approved signage must not have or use flashing lights or display resembling traffic signs or signals.</p>

Source: Bitzios Consulting 2025

6.2.3.2 ILLUMINATION

Electrolight Australia has undertaken a Light Impact Assessment (LIA) to determine whether the existing signage display complies with relevant illumination requirements prescribed under the Transport Corridor Guidelines 2017 and the Australian Standard AS/NZ 4282-2023 The Control of the Obtrusive Effects of Outdoor Lighting. The LIA is reproduced in Appendix H.

The findings from this assessment are discussed in Sub-Section 3.4 of this SEE. Electrolight Australia has confirmed that the existing external illumination of the Silos signage complies in full with the relevant provisions and operates well under the prescribed limit.

6.2.4 Glebe Island and White Bay Master Plan 2000

The repealed SREP 26, now Chapter 4 of the Precincts SEPP provides that development consent for development in the Glebe Island and White Bay Port Area is subject to the Glebe Island and White Bay Master Plan (hereafter referred to as the Master Plan 2000) that was adopted by the NSW Minister for Planning and Urban Affairs on the 23rd May 2000.

The Master Plan 2000 is a deemed DCP for the site and provides an overarching strategic direction to guide the development of the area over a 20-year horizon. The White Bay and Glebe Island Master Plan Area (the Plan Area) is located on the southeastern side of the Balmain Peninsula (see Figure 6.1– Plan Area) has a total land area of about 40 hectares, forms a crescent around White Bay and incorporates an active port water frontage of 2,100m in length.

FIGURE 6.1 PLAN AREA



Source: Glebe Island and White Bay Master Plan 2000

The Master Plan was formulated to provide for the future development of port facilities and recognised the importance of the port to Sydney both for its valuable economic role and the environmental character of the Harbour.

The Master Plan 2000 established a planning and urban design vision for Glebe Island and White Bay. The objectives that underpin the Master Plan are reproduced below:

- *‘Upgrade existing infrastructure to allow for growth and to improve efficiency;*
- *Provide guidelines for all port development;*
- *Improve the public presentation of the port;*
- *Ensure new development is of a high standard of urban design;*
- *Improve management of noise, light spill and traffic;*
- *Provide a framework to resolve potential conflicts between Port operations and adjoining land uses; and,*
- *Improve ESD (Ecologically Sustainable Development) practices to minimise the impacts of current and proposed development and activities.’*

The Master Plan 2000 also recognises that the lands that form the Glebe Island and White Bay Wharves are customs areas under Section 15 of the Customs Act 1901 i.e. a secure zone area with authorised access only (Refer to Figure 6.2).

**FIGURE 6.2 SECURE ZONE (CUSTOMS ACT)
CUSTOMS AREA FOR AUTHORISED ACCESS ONLY**



Source: Glebe Island and White Bay Master Plan 2000

The Master Plan 2000 at Section 2.6 details provisions relating to the display of advertising on the Glebe Island and White Bay lands. The provisions that are relevant to this Application are reproduced below:

'2.6 Advertising

Background

There are two types of advertising in the port: leaseholder signage and commercial third party advertising. Currently advertising is located on the Glebe Island Silos and on the Victoria Road Bridge (over the rail line). The heritage Silos in particular are a dominant visual element in one of Central Sydney's major gateways, which is reinforced by the form of Anzac Bridge. Advertising is a sensitive design issue in such a prominent location.

Principles

- *Prepare signage and advertising guidelines with input from the following professional disciplines: architecture, advertising, landscape, graphics, heritage and traffic safety*
- *Signage and advertising is not to obstruct views to heritage items and to landmarks and is not to interfere with, or adversely impact on views to and from the harbour and its foreshores;*
- *Signage and advertising is not to adversely affect the public domain, particularly with regard to lighting levels, visual impact and overshadowing;*
- *Signage and advertising is to be integrated with the architecture of the host /building /structure and must be contained within the existing profile of the host building / structure;*
- *Free standing, third party advertising structures are to be avoided in the plan area;*
- *Advertising and signage should be compatible with the design of the building / structure and the context of the site;*
- *Each sign and advertisement should be as simple in image as possible with few words; and,*
- *The guidelines should ensure that third party advertising is clearly differentiated from port and leaseholder signage.*

2.6.2 Third Party Advertising

Provisions

- *DUAP or the Minister for Urban Affairs & Planning is the consent authority for advertising.*
- *Development consent for advertising is limited to a period of three (3) years*
- *Encourage simple advertisements, reduced to a logo or simple image with one or three word phrase*

- *Placement of advertising should consider existing signs on a building/structure or site so as to avoid physical and visual clutter'*

In response to the Section 2.6 requirements the former NSW Department of Infrastructure, Planning and Natural Resources prepared the Glebe Island Silos Advertising and Signage Development Control Plan 2004. This document established the design guidelines that are referred to in Section 2.6.

As the Glebe Island Master Plan 2000 is a deemed DCP, pursuant to the provisions of Section 3.43(2) of the EP&A Act 1979 only one DCP may apply in respect of the same parcel of land. Section 3.42(2) is reproduced below.

'3.43 (2) Only one development control plan made by the same relevant planning authority may apply in respect of the same land. This Sub-Section does not apply to:
(a) a plan prepared for the purposes of Sub-Section (1) (d) or for any other purpose prescribed by the regulations, or
(b) a plan prepared for the purpose of amending an existing plan. If this subSection is not complied with, all the development control plans concerned have no effect.'

Accordingly, as the Glebe Island Silos Advertising and Signage Development Control Plan 2004 (hereafter referred to as the Glebe Island Advertising DCP 2004) was adopted after the Glebe Island Master Plan 2000, the advertising provisions that are contained in that DCP are the relevant controls that apply to the advertising signage on the Silos. An assessment of the compliance of the proposal against these provisions follows in Sub Section 6.2.5.

6.2.5 Glebe Island Silos Advertising Signage Development Control Plan 2004

The Glebe Island Advertising DCP 2004 was prepared to support the repealed Sydney Regional Environmental Plan No. 26 (SREP 26) – City West, now Part 4.2 Precincts SEPP and the provisions of the Glebe Island Master Plan 2000. The DCP document also states that it was-

'prepared in accordance with State Environmental Planning Policy No. 64 (SEPP 64) which requires a DCP to be in force before development consent can be granted for the erection of new roof signage'.

The DCP contains design guidelines for advertisements on the Glebe Island Silos. The guidelines are based on an analysis of the existing character of the local area, key features of the area, desired future character of the area and the role of outdoor advertising. An assessment of the compliance of the proposal against these guidelines is detailed in Table 6.5.

The Glebe Island Advertising DCP 2004 specifically applies to the Glebe Island and White Bay Silos and was prepared following the expiration of the 1992 Consent that granted a 10-year consent for the display of Olympic advertising on the Silos structure. The DCP document specifically states:

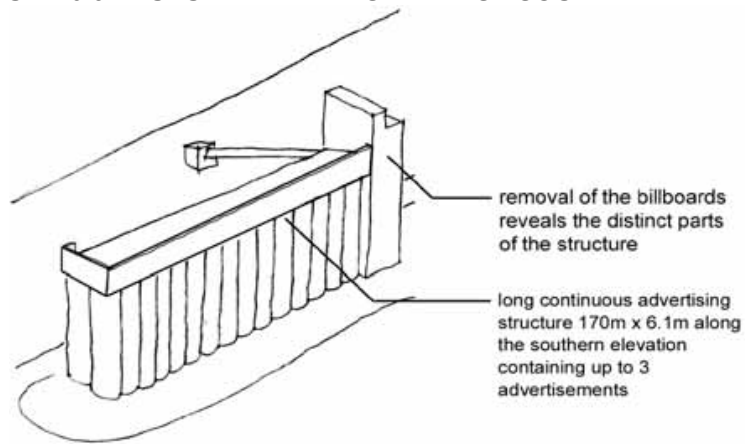
'The expiry of the development consent for the existing signage on the Glebe Island Silos has necessitated the preparation of this DCP and its formulation in accordance with SEPP 64 and the Glebe Island and White Bay Master Plan. Having a DCP in place will enable consideration of a development application for the upgrade of advertising signage and structures on the Silos.'

Clause 3 of the DCP sets out the Aims and Objectives of the DCP. These are reproduced in the highlighted Section below.

- *'To provide design guidelines for advertising on top of the Silos*
- *To encourage advertising signage that is compatible with the heritage Silos and the industrial character of the surrounding port'*

Figure 13 of the Glebe Island Advertising DCP 2004 (which is reproduced at Figure 6.3A-C) details the design specifications for an advertising structure on the Silos. The existing advertisements that were approved under DA041-09-2011 and that currently exist on the Silos continue to comply in full with these requirements. This Modification Application proposes no change to the physical dimensions of the signage display or its support structure.

FIGURE 6.3A FUTURE ADVERTISEMENTS - SOUTHERN ELEVATION



**FIGURE 6.3B
FUTURE ADVERTISEMENT WESTERN ELEVATION - EASTERN & NORTHERN ELEVATIONAL TREATMENT**

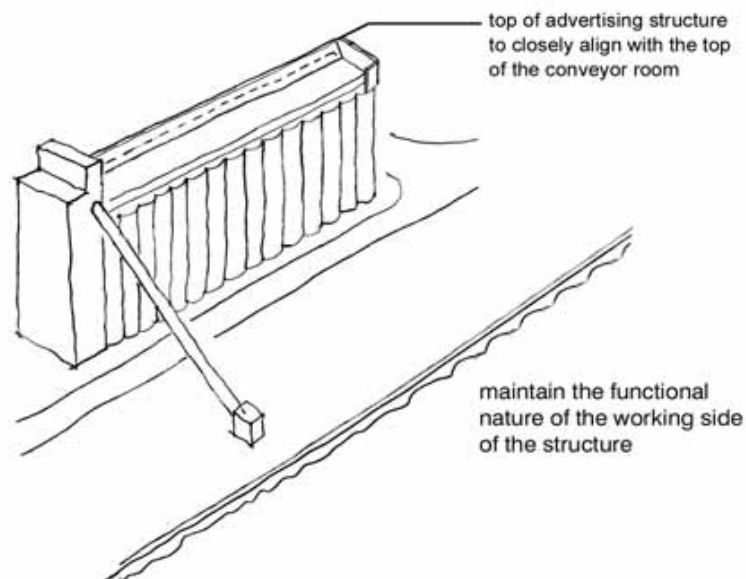
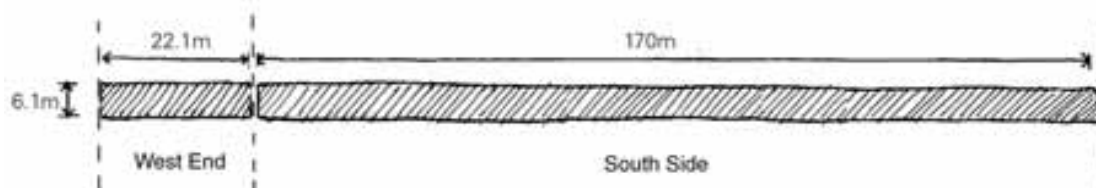


FIGURE 6.3C FUTURE ADVERTISEMENTS PLAN VIEW



Source: Glebe Island Advertising DCP 2004 -Figure 13

TABLE 6.5 GLEBE ISLAND ADVERTISING DCP 2004 COMPLIANCE

DCP PROVISION	COMMENT	COMPLIANCE
11.0 Advertising Structure <ul style="list-style-type: none"> Advertising is restricted to the southern and western sides where the decorative treatment relates to the busy, public nature of the main roads. Advertising to be removed from the vertical Silo structure at the eastern end of the southern elevation. A continuous structure along the southern side (6.1m in height x 170m in length) and western side (6.1m in height and 22.1m in length) of the Silo parapet and up to four separate advertisements, three on the southern side and one on the western side. The signage system is to be a stretched skin with no extraneous structures or fixings in view, apart from the necessary lighting fixtures. All access to the advertising panels for installation shall be made easily and safely in accordance with Occupational Health and Safety Guidelines. The view of the rear of the signs from the Balmain peninsula is to be finished appropriately to screen the working face of the sign panels. 	The existing advertising signage complies with the Clause 11 provisions. This Application proposes no changes to the dimensions and physical appearance of the advertising structure.	YES
11.1 Life of Approval <ul style="list-style-type: none"> Development consent for advertising is limited to a period of three (3) years, consistent with the provisions of SEPP 64 and the Glebe Island and White Bay Master Plan. 	This Application seeks a three (3) year consent.	YES
11.2 Display of Messages <ul style="list-style-type: none"> The advertising panels are to be continuously occupied by simple messaging or graphics. They should never appear vacant. 	The landmark and iconic status of the signage means that it is in constant demand by international and national companies that seek high level brand exposure. The content is rotated on a 28 day lunar cycle. The proposal will not change the display status of the advertising structure.	YES
11.3 Lighting	The existing advertising structure is externally illuminated by top mounted	YES

<ul style="list-style-type: none"> • <i>Lighting may be installed for night-time external illumination of advertising signs.</i> • <i>Light structures are to be discrete, and light spill is to be contained to the face of the signs.</i> • <i>Animated or flashing lighting is not permitted.</i> 	<p>down lights that are cantilevered in front of the signage face. The lights do not flash, flicker or dazzle. The signs are not illuminated from 11pm to 6am.</p>	
	<p>Electrolight Australia has undertaken a LIA to ascertain whether the existing illumination levels of the signage display comply with the relevant controls for its non-curfew operation. This assessment has concluded that the current lighting is well below the requirements of the Transport Corridor Guidelines 2017 and AS 4282-2023 Control of the Obtrusive Effects of Outdoor Lighting.</p>	
<p>11.4 Materials and Finishes</p> <ul style="list-style-type: none"> • <i>Materials to be used in the structure are to be durable and of high quality, ensuring the use of non-reflective surfaces suitable for an outdoor industrial location.</i> • <i>Materials are to respect the heritage status of the Silos.</i> 	<p>The display of advertising on the Silos has been undertaken in accordance with the principles for the adaptive reuse of heritage items. The signage display is confined to the roof parapet of the southern and western elevations only. This ensures that the northern and eastern elevations are retained in their original state and as a complete operating structure with distinguishable component parts such as the conveyor arm and eastern tower.</p>	YES
	<p>The graphic content of the advertisements that are displayed on the Silos are of the highest quality given the iconic and landmark status of the structure. The advertisements are printed onto vinyl skins which are tensioned across the steel frame of the advertising structure. The content is changed on a 28 day rotation which maintains visual interest in the advertising.</p>	
	<p>This Application proposes no change that would impact the appearance or quality of the existing advertising displays.</p>	
<p>11.5 Development Application Requirements</p> <ul style="list-style-type: none"> • <i>Details of the sign structures dimensions, materials, finishes, servicing access and integration with the existing Silos structure are to be submitted in scaled architectural drawings.</i> • <i>Details of illumination method and fixtures are to be provided with the development application.</i> 	<p>This Application is lodged under s.4.55(2) of the EP&A Act and no changes or works are sought to the structure or signage.</p> <p>This SEE and the accompanying supporting documentation complies with the Application requirements specified by the DPHI during the pre-consultation process.</p> <p>The LIA specifies that the luminance of the nighttime lighting of the</p>	YES

- *Illumination levels (lux levels) are to be provided with the development application.* advertising displays is 58 cd/m² which is well below that 200cd/m² specified in the Transport Corridor Guidelines 2017 and AS 4282-2023.

Source: Compiled by Urban Concepts 2025

6.2.6 Bays West Place Strategy 2021

The Bays West Place Strategy 2021 and its supporting plans are discussed in Section 3 of this SEE. As discussed, work is planned to commence in Sub-Precinct 1 (Stage 1 of the Bays West Strategy) to align with the opening of the Sydney West Metro Line and Station in 2032. Development in Sub-Precinct will occur after the three (3) year extension of consent.

As detailed in Section 3 of this SEE, the proposal to extend the consent duration of the advertising signage on Silos is consistent with the continuation of port and maritime uses at Glebe Island which is provided for in Sub-Precincts 3, 4 and 5 of the Bays West Place Strategy 2021 and will not adversely impact urban renewal plans for Sub-Precinct 1 (Stage 1).

The Modification Application does not propose any physical works to the Glebe Island Silos and as such the intention to recognise the Silos as an iconic heritage landmark within the Bays West Precinct is not compromised by this Application.

As discussed throughout this SEE and within each of the specialist reports, the ongoing display of the signage for another three (3) year term will not adversely affect any development which is now possible under the recently approved Stage 1 Rezoning and Master Plan if it were to be completed prior to September 2028. It was acknowledged by the DPHI in the pre application meeting that little or no residential development is likely to occur within the next three (3) year term.

6.2.7 State Environmental Planning Policy (Biodiversity and Conservation) 2021

Part 6.3 of the State Environmental Planning Policy (Biodiversity and Conservation) 2021 (Biodiversity and Conservation SEPP) aims to protect natural assets and ensure that the public good takes precedence over private interests and sets out controls for land in the Sydney Harbour Foreshores and Waterways Area. The Site is located within the land mapped on the Sydney Harbour Foreshores and Waterways Area Map on Sheet FWA_001. As confirmed in Section 6.26(3) the site is not within a zone referred to in Clause 6.7:

'This section does not affect the zoning, under another environmental planning instrument, of land in the Foreshores and Waterways Area if the land is not included in a zone under this section.'

Division 3 of Part 6.3 of the Biodiversity SEPP includes assessment criteria for development in foreshore and waterway areas. Table 6.6 confirms the compliance of the proposal against the Division 3 assessment criteria.

TABLE 6.6 SEPP (BIODIVERISTY AND CONSERVATION) 2021 DEVELOPMENT IN FORESHORE AND WATERWAYS AREA COMPLIANCE TABLE

SEPP (BIODIVERISTY AND CONSERVATION) 2021	COMMENT	COMPLIANCE
<i>Division 3 Development in Foreshore and Waterways Area</i>		
6.28 General		
(1) In deciding whether to grant development consent to development in the Foreshores and Waterways Area, the consent authority must consider the following—		
<i>(a) whether the development is consistent with the following principles—</i>	The proposed Modification Application for the continuation of the signage for a further three (3) year term does not alter the existing ownership of the land by the Port Authority. As such, the Silos are retained as a public asset.	YES
<i>(i) Sydney Harbour is a public resource, owned by the public, to be protected for the public good,</i>	The Modification Application will continue to provide a Public Benefit to the community under the existing Voluntary Planning Agreement with Inner West Council which provides a monetary contribution to be used towards heritage conservation within the Inner West LGA.	
<i>(ii) the public good has precedence over the private good,</i>	Further, views from both the public and private domains have been examined by Urbis. The VIA concluded that there will not be any additional impacts on either public or private views. Refer to Appendix E.	
<i>(iii) the protection of the natural assets of Sydney Harbour has precedence over all other interests,</i>	The extension to the consent duration of the signage for a further three (3) years will not have an adverse impact upon the protection of natural assets within Sydney Harbour. The EAR prepared by Cumberland Ecology on the impacts of the Silos signage lighting on nocturnal birds and bats concluded that there is no significant impact on local wildlife. Refer to Appendix J.	
<i>(b) whether the development will promote the equitable use of the Foreshores and Waterways Area, including use by passive recreation craft,</i>	The continuation of the signage on the Silos for an additional three (3) year term will not alter the continuation of the current use of the surrounding waterways noting that the waterways immediately adjacent to the Silos are a restricted area with no accessibility by passive recreational craft.	YES
<i>(c) whether the development will have an adverse impact on the Foreshores and Waterways Area, including on commercial and recreational uses of the Foreshores and Waterways Area,</i>	The continuation of the signage on the Silos for an additional three (3) year term will not adversely impact the commercial and maritime uses of the surrounding Foreshores and Waterways Area. Noting that there is no recreational access in this area of Glebe Island.	YES
<i>(d) whether the development promotes water-dependent land uses over other land uses,</i>	The retention of the signage neither promotes nor impedes water-dependent land uses over other land uses.	YES

<i>(e) whether the development will minimise risk to the development from rising sea levels or changing flood patterns as a result of climate change,</i>	Given the height of the Silos signage there will be no risk of changing flood patterns and rising sea levels.	YES
<i>(f) whether the development will protect or reinstate natural intertidal foreshore areas, natural landforms and native vegetation,</i>	Retention of the signage on the Silos will have no impact on natural intertidal foreshore areas, natural landforms and native vegetation.	YES
<i>(g) whether the development protects or enhances terrestrial and aquatic species, populations and ecological communities, including by avoiding physical damage to or shading of aquatic vegetation,</i>	The continued use of the signage for an additional three (3) year term has no impact upon terrestrial and aquatic species, populations and ecological communities in terms of physical damage to or shading of aquatic vegetation because the signage is positioned within the building envelope of the Silos. The EAR undertaken by Cumberland Ecology provided in Appendix J has made a thorough assessment of all other ecological impacts.	YES
<i>(h) whether the development will protect, maintain or rehabilitate watercourses, wetlands, riparian lands, remnant vegetation and ecological connectivity.</i>	The EAR concludes that no significant impact is predicted to occur to any species because of the project.	YES
(2) Development consent must not be granted to development in the Foreshores and Waterways Area unless the consent authority is satisfied of the following—		
<i>(a) having regard to both current and future demand, the character and functions of a working harbour will be retained on foreshore sites,</i>	The Glebe Island Silos form and integral part of Glebe Island on land that is owned and managed by the Port Authority. As discussed within this SEE, the character and functions of a working harbour will be retained in this area of the harbour to cater for existing and future ports and industry use. The continuing display of the signage for an additional three (3) year term will not impede such activity.	YES
<i>(b) if the development site adjoins land used for industrial or commercial maritime purposes—the development will be compatible with the use of the adjoining land,</i>	The signage has been in place for 32 years and in this time has proven to be a compatible use with the surrounding industrial, commercial and maritime uses. The continuing display of the signage for a further (3) year term will not alter this relationship.	YES
<i>(c) if the development is for or in relation to industrial or commercial maritime purposes—public access that does not interfere with the purposes will be provided and maintained to and along the foreshore,</i>	There is no public access into or around the Glebe Island Silos. Access is restricted under the Customs Act 1901.	
<i>(d) if the development site is on the foreshore—excessive traffic congestion will be minimised in the zoned waterway and along the foreshore,</i>	The continuation of the use of the signage for a further three (3) year duration will not affect traffic into or out of Glebe Island by water or by land. Refer to the Bitzios TSA in Appendix I.	YES
<i>(e) the unique visual qualities of the Foreshores and Waterways Area and its islands, foreshores and tributaries will be enhanced, protected or maintained,</i>	The VIA undertaken by Urbis assesses the potential visual impacts of continuing the signage display. As part of this assessment views of the Silos from several vantage points	YES

including views and vistas to and from—

- (i) the Foreshores and Waterways Area, and
- (ii) public places, landmarks and heritage items.

in the public and private domain were examined. Urbis concluded that:

'The retention of signs for an additional three year period, will not generate any additional visual effects or impacts on the existing character and scenic quality of public and private domain views, will not block access to and from the heritage item (Glebe Island Silos) will not increase the potential visual catchment, and will not create any additional impacts to those which currently occur.'

Compiled by Urban Concepts with information contained in the Cumberland Ecology EAR, the Urbis VIA, the Electrolight Australia LIA and the Bitzios consulting TSA.

6.2.8 Conclusion

This Sub-Section has examined the compliance of this Modification against the relevant environmental planning instruments and adopted policies. The assessment has drawn from specialist advice in lighting, heritage, traffic, ecology and visual impact. It demonstrates that the display of the existing signs on the western and southern elevations of the Silos comply in full with the stated provisions and that a three (3) year extension to the consent duration can be supported under the relevant planning provisions.

6.3 Section 4.15 (1) (b) Other Impacts of the Development

6.3.1 Amenity and the Surrounding Land Uses

The character of the immediate surrounding lands of Glebe Island and White Bay is secured land under the care and control of the Port Authority and is used for industrial and maritime related uses. There is no residential development in the immediate vicinity of the site. The Glebe Island site is planned to be retained for maritime uses in the long term and will continue as a working port to service the States infrastructure project over the next decade.

As stated above in Sub-Section 6.2.6 and in Section 3 of this SEE, the proposed 5–8-year development timeline for Bays West Stage 1 will not coincide with the three (3) year extension of consent. This development timeline has been confirmed by the DPHI, who agree it is highly unlikely that residential development will occur within the three (3) year extension to the consent duration. The proposal to extend the consent duration of the advertising signage on the Silos is consistent with the continuation of port and maritime uses at Glebe Island as provided for under Sub Precincts 3, 4 and 5 and will not adversely impact development in Sub Precinct 1 (Stage 1) over the next three years .

Robust and independent specialist investigations have been undertaken to determine the visual, heritage, ecological, lighting and traffic safety impact of extending the consent duration for a three (3) year term. The findings from these investigations which are examined in this Section have not identified any matters that would render the Modification as being undesirable for existing or proposed surrounding land uses.

6.3.2 Socio and Economic Factors

The Glebe Island Silos advertising structure is recognised as a landmark out of home advertising asset. It is an iconic site and is in constant demand by national and international entities who seek high level brand exposure. Its unique dimensions and landmark location has seen the structure being used to anchor the major advertising promotions of companies such as Telstra, Paramount, Nike, Apple, Myer, KFC, AGL, Warner Bros, Specsavers, Alliance and the like.

Landmark billboards like the Glebe Island Silos allow Out of Home publishers to drive interest and develop wider ranging out of home asset networks crucial to public interest messaging. Out of Home advertising also promotes consumer spending with local and larger businesses which provides economic benefits to the broader community. These networks are relied upon by both the private and public sector for public interest campaigns. Without significant investment in landmark advertising assets such as the Silos, the development of out of home assets across the broader metropolitan area by companies such as Eye Drive Sydney Pty Ltd would not be possible. Accordingly, the ability to realise a further three (3) years of advertising revenue from the Silos advertising structure will have a positive socio-economic impact on the out of home industry.

To satisfy the Public Benefit provisions of Chapter 3 IESEPP, this Application will maintain the existing Voluntary Planning Agreement that was executed with the Development Application. This provides a monetary contribution that is paid annually by Eye Drive Sydney Pty Ltd (or its Parent Company) to the Inner West Council and takes effect for the duration of the development consent.

can be used by Eye Drive Sydney to fund the development of future out of home assets and smart city technological investment within NSW.

At the same time, the commercial lease agreement between Eye Drive Sydney Pty Ltd and the Port Authority of NSW provides an important revenue stream that assists the Authority to fund a range of activities, these include environmental programs and many communities focused events that occur around the Sydney Harbour waterfront.

It is our professional opinion that extending the consent duration for the Glebe Island Silos advertising signage for a further three (3) year term will deliver a range of socio-economic benefits for both State and Local Government and the local community.

6.3.3 Illumination and Lighting Impact

A LIA undertaken by Electrolight Australia Pty Ltd has identified that the site is located in a Zone 3 area under the Transport Corridor Guidelines 2017. Maximum dimming and luminance levels are prescribed under the Transport Corridor Guidelines 2017 and the Australian Standard AS 4282-2023 for the Control of the Obtrusive Effects of Outdoor Lighting. These controls are discussed within the LIA detailed in Appendix H. As they establish an allowable nighttime luminance for the advertising signage of 200cd/m². The LIA establishes that the lighting of the Silos advertising operator at 58 cd/m² which is well under the allowable limit.

The LIA report concludes that the existing front lit signage installed at Glebe Island Silos complies with the following criteria, guidelines and standards:

- State Environmental Planning Policy (Industry and Employment) 2021 – Chapter 3 Advertising and Signage.
- Transport Corridor Outdoor Advertising and Signage Guidelines 2017 – Section 3.3.3.
- Glebe Island Silos Advertising Signage Development Control Plan – Section 11.3 Lighting.
- Relevant Sections of AS 4282-2023 Control of the Obtrusive Effects of Outdoor Lighting.

6.3.4 Landscape and Vegetation Management

The proposal does not involve any landscaping works.

6.3.5 Utility Services

Electricity is available to the site. The proposal does not raise any concerns regarding the provision of utility services.

6.3.6 Visual Impact

Urbis has undertaken a view impact assessment (VIA) of the potential impacts of the advertising signage, the potential visual exposure of the proposal, the potential effect of the proposal on the emerging desired future character of the immediate and wider locality and the potential effects on existing views from the public domain including roads, infrastructure and reserves. This includes, Johnstons Bays, Waterfront Park, Glebe and Blackwattle Bay and Rozelle Parklands. The Urbis VIA is reproduced in Appendix E of this report.

Urbis examined fourteen (14) medium distant views each within a view catchment of 500 metres to 800 metres of the site. This assessment methodology which Urbis utilised is set out below.

'The Urbis methodology identifies objective 'visual baseline' information about the site and surrounds, analyses the extent of visual effects or quantum of change using visual aids from key locations, and considers the importance of that change. The significance of the extent of visual effects is explained and determined in the visual impact assessment Section of the method and this report'

Urbis ranked each view low, medium, or high based on the visual effects and impacts the signage has on that view. A description for each ranking is provided in the following tables, which have been reproduced from the Urbis VIA.

TABLE 6. 7 UBRIS METHODOLOGY VISUAL EFFECTS DESCRIPTION

Factors	Low Effect	Medium Effect	High Effect
Scenic quality	<i>The proposal does not have negative effects on features which are associated with high scenic quality, such as the quality of panoramic views, proportion of or dominance of structures, and the appearance of interfaces.</i>	<i>The proposal has the effect of reducing some or all of the extent of panoramic views, without significantly decreasing their presence in the view or the contribution that the combination of these features make to overall scenic quality</i>	<i>The proposal significantly decreases or eliminates the perception of the integrity of any of panoramic views or important focal views. The result is a significant decrease in perception of the contribution that the combinations of these features make to scenic quality</i>
Visual character	<i>The proposal does not decrease the presence of or conflict with the existing visual character elements such as the built form, building scale and urban fabric</i>	<i>The proposal contrasts with or changes the relationship between existing visual character elements in some individual views by adding new or distinctive features but does not affect the overall visual character of the precinct's setting.</i>	<i>The proposal introduces new or contrasting features which conflict with, reduce or eliminate existing visual character features. The proposal causes a loss of or unacceptable change to the overall visual character of individual items or the locality.</i>
View place sensitivity	<i>Public domain viewing places providing distant views, and/or with small number of users for small</i>	<i>Medium distance range views from roads and public domain areas with medium number of viewers for a</i>	<i>Close distance range views from nearby roads and public domain areas with medium to high</i>

	<i>periods of viewing time (Glimpses-as explained in viewing period).</i>	<i>medium time (a few minutes or up to half day-as explained in viewing period).</i>	<i>numbers of users for most the day (as explained in viewing period).</i>
Viewer sensitivity	<i>Residences providing distant views (>1000m).</i>	<i>Residences located at medium range from site (100-1000m) with views of the development available from bedrooms and utility areas.</i>	<i>Residences located at close or middle distance (<100m as explained in viewing distance) with views of the development available from living spaces and private open spaces.</i>
View composition	<i>Panoramic views unaffected, overall view composition retained, or existing views restricted in visibility of the proposal by the screening or blocking effect of structures or buildings.</i>	<i>Expansive or restricted views where the restrictions created by new work do not significantly reduce the visibility of the proposal or important features of the existing visual environment.</i>	<i>Feature or focal views significantly and detrimentally changed.</i>
Viewing period	<i>Glimpse (e.g. moving vehicles).</i>	<i>Few minutes to up to half day (e.g. walking along the road, recreation in adjoining open space).</i>	<i>Majority of the day (e.g. adjoining residence or workplace).</i>
Viewing distance	<i>Distant Views (>1000m).</i>	<i>Medium Range Views (100-1000m).</i>	<i>Close Views (<100m).</i>
View loss or blocking effect	<i>No view loss or blocking.</i>	<i>Partial or marginal view loss compared to the expanse/extent of views retained. No loss of views of scenic icons.</i>	<i>Loss of majority of available views including loss of views of scenic icons.</i>

Source: Urbis VIA 2025

TABLE 6.8 UBRIS METHODOLOGY VISUAL IMPACTS DESCRIPTION

Factors	Low Impact	Medium Impact	High Impact
Physical absorption capacity	Existing elements of the landscape physically hide, screen or disguise the proposal. The presence of buildings and associated structures in the existing landscape context reduce visibility. Low contrast and high blending within the existing elements of the surrounding setting and built form.	The proposal is of moderate visibility but is not prominent because its components, texture, scale and building form partially blend into the existing scene.	The proposal is of high visibility and it is prominent in some views. The project location is high contrast and low blending within the existing elements of the surrounding setting and built form.
Compatibility with urban/natural features	High compatibility with the character, scale, form, colours, materials and spatial arrangement of the existing urban and natural features in the immediate context. Low contrast with existing elements of the built environment.	Moderate compatibility with the character, scale, form and spatial arrangement of the existing urban and natural features in the immediate context. The proposal introduces new urban features, but these features are compatible with the scenic character and qualities of facilities in similar settings.	The character, scale, form and spatial arrangement of the proposal has low compatibility with the existing urban features in the immediate context which could reasonably be expected to be new additions to it when compared to other examples in similar settings.

Source: Urbis VIA 2025

6.3.6.1 Visual Impacts

The conclusion reached by Urbis following their view assessment is reproduced below:

'The potential visual effects and impacts of the sign in relation to future potential development within Sub Precinct 1 of the Bays West Place Strategy 2021 are likely to be low and limited. Future public and private development with the potential to increase viewer numbers within the precinct is unlikely over the next 3 years.'

We have undertaken baseline research to determine the predominant visual character, scenic resources of the site and determined that in all views, in all cases that the existing signage generates a low level of visual effects on view composition, visual character, visual resources of the site (the heritage item itself and its industrial maritime setting). The existing signage does not create any view blocking or view loss effects.

*Visual effects on all baseline factors were rated at **LOW**.*

*In all views, the public domain view place sensitivity was rated as **HIGH**, likely private domain views as **LOW** (given the distance, orientation, whole views available, potential access to views and that no visual change is proposed) and visual absorption capacity as **HIGH**.*

The s4.55 Modification application will not generate any visual clutter.

*In addition, there is **HIGH** compatibility of the proposed development with existing compositional features, **HIGH** Compatibility with the regulatory framework (relevant objectives and controls) and **HIGH** Compatibility with endorsed desired future character for the immediate environs of the site.*

*The low level of visual effects and high level of up-weight in relation to relevant factors (with the exception of view place sensitivity) result in overall reduce the overall visual impact of the sign in views to **LOW**.*

In our opinion, the existing level of visual effects and impacts generated by the existing signage are reasonable and acceptable and as such the proposed s4.55 Modification application to retain the existing situation for an additional three years is supported.'

6.3.6.2 View Impact From The Road Carriageway

In respect to the impact of the signs on views from the road carriageway Urbis conclude:

'We acknowledge high visibility to the signage from limited Sections of close road carriageways. Notwithstanding this, such views are only available for a short duration and would be seen from moving viewing situations. Large format signs are typical and common features within road corridors and highly urbanised visual settings. The local visual prominence of the existing sign provides a 'landmark feature' where the signage and Silos are perceived as a singular focal point which has been in-situ for more than 30 years.'

6.3.7 Heritage or Special Area Characteristics

A Heritage Impact Statement (HIS) has been undertaken by NBRS and is reproduced in Appendix F. A summary of the assessment and the conclusion that has been reached by NBRS follows.

6.3.7.1 Evaluation of Heritage Controls

The HIS includes an assessment of the proposed Modification against the relevant heritage controls in the following plans and policies:

- State Environmental Planning Policy (Precincts—Eastern Harbour City) 2021
- State Environmental Plan Policy (Industry and Employment) 2021
- Glebe Island Silos Advertising and Signage DCP 2004

The NBRS findings from each assessment follow.

HERITAGE COMPLIANCE WITH STATE ENVIRONMENTAL PLANNING POLICY (PRECINCTS—EASTERN HARBOUR CITY) 2021

The Precincts SEPP applies to the subject land. Schedule 4, Part 3 of the Precincts SEPP identifies Heritage Items. The Glebe Island Wheat Silos are listed as a heritage Item (Item 1) on the schedule. In addition, the following items in the general vicinity of the Silos are also listed as Heritage items:

- Item 4 - Sewerage pumping station, Roberts Street;
- Item 5 - Monument, Glebe Island;
- Item 7 - Railway Bridge, Railway Parade;
- Item 9 - Railway truss bridge, Johnston Street; and
- Item 11 - White Bay Power Station complex

The Precincts SEPP has heritage specific clauses that need to be addressed as part of development to, or in the vicinity of heritage items. These are set out in Table 6.8 below together with a statement of compliance.

TABLE 6.9 PRECINCTS SEPP HERITAGE CONTROLS

Part 4.3 Precincts	
Division 6 Heritage conservation	
4.37 General considerations	Comment
Development of or including a heritage item, in the vicinity of a heritage item, or within a conservation area, must be compatible with the conservation of the heritage significance of the item or the character of the conservation area	<p>The subject site, Glebe Island Wheat Silos (Item 1), is listed as a heritage item in Schedule 4, Part 3 - Items in the Bays Precinct of the SEPP (Precincts—Eastern Harbour City) 2021.</p> <p>In addition, the following heritage items are listed in the SEPP (Precincts—Eastern Harbour City) 2021 and located in the vicinity of the subject site:</p> <ul style="list-style-type: none"> • Item 5 - Monument, Glebe Island; and • Item 11 - White Bay Power Station complex. <p>The retention of the existing signage which is the subject of this Modification of the approved development application does not alter the appreciation, setting or views of these heritage items</p>
4.38 Duty of consent authority	
<p>Before granting consent to any such development, the consent authority must consider:</p> <ul style="list-style-type: none"> • the heritage significance of the heritage item or conservation area, and • the impact that the proposed development will have on the heritage significance of the heritage item and its setting or the conservation area, and • the measures proposed to conserve the heritage significance of the heritage item and its setting or the conservation area, and • whether any archaeological site or potential archaeological site would be adversely affected. 	<p>The proposed development of a heritage item and within the vicinity of other heritage items, must be in keeping with the heritage significance and character of the respective heritage items. As the advertising signage is well above ground, the development will not impact the significance of the heritage item itself, nor other heritage items in the vicinity. No aspects of the Modification proposal involve sub surface investigations.</p>
4.39 Conservation management plans and heritage impact statements	
<p>The consent authority must decline to grant consent for development relating to a heritage item or conservation area unless it has taken into consideration a conservation management plan or heritage impact statement which includes an assessment of the matters listed in Section 4.38.</p>	<p>This Heritage Impact Statement (HIS) has been prepared in accordance Clause 4.39, determine the positive and negative heritage impacts associated with the proposed Modification of the DA to extend the consent of the existing signage mounted on the upper structure of the Glebe Island Silos for an additional three (3) year period.</p>

Source: NBRS Architecture 2025

In respect to the compliance of the proposal with the heritage objectives that underpin the Precincts SEPP NBRIS state:

'For the reasons established in the assessment in Section 6.0, the Modification proposal is, therefore, considered to be consistent with the relevant heritage objectives of the SEPP (Precincts—Eastern Harbour City) 2021, which are:

"Appendix 8 - Stage 1 Bays West Precinct Part 5 Heritage conservation 13 Objectives of Part The objectives of this Part are as follows— (a) to conserve the environmental heritage of the Stage 1 Bays West Precinct, including the White Bay Power Station and heritage curtilage, (b) to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,"

COMPLIANCE WITH SCHEDULE 5 OF STATE ENVIRONMENTAL PLANNING POLICY (INDUSTRY AND EMPLOYMENT) 2021

Schedule 5 includes a criterion that relates to heritage impact. The relevant extract from the NBRIS HIS that addresses the compliance of the proposal against this criteria is in Table 6.10.

TABLE 6.10 SCHEDULE 5 IESEPP SCHEDULE 5 HERITAGE CRITERIA

STATUTORY CONTROL	COMMENT
IESEPP, Schedule 5 Assessment criteria 2 Special areas <i>Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas</i>	<i>The bold gesture of the advertising signage on the Glebe Island Silos is compatible with the heritage Silos and industrial character of the surrounding port. Half of the Glebe Island Silos structure, the North and East Elevations, has retained the original form and finish of the industrial concrete storage Silo structure. This allows readily for the interpretation of the original storage structure.</i>

Source: NBRIS Architecture 2025

COMPLIANCE WITH GLEBE ISLAND SILOS ADVERTISING AND SIGNAGE DCP 2004

The aims and objectives of the Glebe Island Silos Advertising and Signage DCP 2004 (Glebe Island Silos DCP) are:

- To provide design guidelines for advertising on top of the existing Glebe Island Silos.
- To encourage advertising signage that is compatible with the heritage Silos and the industrial character of the surrounding port.

Clause 8.2 of the DCP incorporates heritage provisions. Table 6.11 incorporates an extract from the NBRIS HIS addressing the relevant DCP provisions.

TABLE 6.11 GLEBE ISLAND SILOS ADVERTISING AND SIGNAGE DCP 2004

DCP CONTROL	COMMENT
<p>8.2 Heritage</p> <p>The Silos are identified as a heritage item under the Bays Precinct provisions of SREP 26. The Bays Precinct was incorporated into SREP 26 in November 1997.</p> <p>The heritage listing of the Silos occurred some five years after temporary consent (10 years) has been issued in 1992 for the erection of advertising signs as part of the Olympic Bid.</p> <p>Under Clause 31 of the SREP 26, consent cannot be granted for development relating to heritage items unless the consent authority has considered a conservation management plan or a heritage impact statement which includes an assessment of the impacts on the heritage item.</p>	<p>The retained structures of the Glebe Island Silos were gazetted as a heritage item in 1997, five years after advertising signage was erected on the structure.</p> <p>This report has been prepared to accompany the proposed Modification of DA21/13182, which seeks consent for the retention of the existing signage structures on the Glebe Island Silos, and for the ongoing use of the structure for the display of illuminated advertising signage for a period of three (3) years.</p> <p>No physical changes are proposed to the Glebe Island Silos. The approval would be for legal changes only.</p> <p>The works are substantially the same development as the existing and in accordance with the Glebe Island Silos DCP. "Substantially" to mean "essentially or materially having the same essence".</p>

Source: NBRIS Architecture 2025

6.3.7.2 Heritage Impact Assessment

A summary of the heritage impact of the proposal from the NBRIS HIS follows.

'The following aspects of the proposal respect or enhance the heritage significance of the item or conservation area for the following reasons:

- An approval for the advertising signage atop the Glebe Island Silos does not diminish the significance or appreciation of the distinctive cylindrical form and large scale of the structures as it does not obscure nor damage the distinctive silos.*
- The size and proportion of the existing signage is determined by the length and height of the conveyor building that runs across the top of the silos. In this way, the original form and scale of the silos structures is retained.*
- There will be no change to the physical and visual relationship between the Anzac Bridge, the Glebe Island Bridge and the White Bay Power Station. All these historic items are contained within the area designated The Bays Precinct and will continue to contribute to the future character of the area.*
- Whilst the illuminated signage is clearly a non-historic element of the wider views of the area, it sits alongside other lighting features that allow the illumination of the Anzac Bridge, the roadways and foreshore generally.*
- The Glebe Island Silos Olympic Mural is not linked in any way to the significance of the silos themselves. There are no physical or visual changes to the mural.*
- The existing illumination levels and hours of operation will be maintained.*

The following aspects of the proposal could detrimentally impact on heritage significance. The reasons are explained as well as the measures to be taken to minimise impacts:

- The consent for advertising signage atop the existing Glebe Island Silos would not diminish the appreciation or understanding of the silo structures and would not impact the heritage significance of the site.'*

6.3.7.3 NSW Heritage Guidelines

The NBRS HIS assessment of the proposal against the NSW Heritage Guidelines is reproduced below.

6.3.1 NEW SIGNAGE (EXISTING)

- **How has the impact of the new signage on the significance of the heritage item been minimised?**

Comment: In 1917, grain Silos were first constructed at Glebe Island. The Grain Silos complex was extended over the years with numerous phases of alteration and Modification, including demolition of the original Silos in the 1970s. The Silos were decommissioned for grain storage in 1984. The use of the Silos changed in 1994, when the Silos were converted to cement and sugar storage. This would have required alteration to the design of the Silos. The existing Glebe Island Silos date to the 1975 phase of development which comprised a multi-million-dollar extension to the system. The works included 30 cylindrical concrete Silos 38.4 m high, each having a capacity of 2,400 tonnes. The physical fabric of the existing Glebe Island Silos is not significant as early fabric, nor are they the same scale, size and overall form as the original complex – the advertising signs do not cover or negatively / detrimentally impact on the fabric of the Silos. The machinery tower on the upper Section of the north and east elevations of the Silo complex remains visible as signage is not located on these facades. This allows continued public appreciation and interpretation of the structures. The primary significance of the Glebe Island Grain Silos are their historic associations with the Primary Industry and grain production. Over the next ten-year period, the retention of the advertising signage is unlikely to have any impact on the historic significance of the Glebe Island Silos and its setting. The development of The Bays West Precinct contemplates significant changes to the setting of the Silos, and the other heritage items in the precinct. For this reason, a consent to maintain the existing situation is acceptable.

- **Have alternative signage forms been considered (e.g. free-standing)? Why were these alternatives rejected?**

Comment: The historical significance of the Silos is legible as a complete operating structure with distinguishable component parts such as the conveyor arm and eastern tower, with the advertising signage located around the parapet but leaving the eastern tower exposed. The form and proportions of the signage is based on the scale of the conveyor room structure and was an acceptable negotiated outcome with the consent authority for the earlier approval. There are no changes proposed to the proportion or location of the existing signage.

- **Is the signage in accordance with required local planning provisions?**

Comment: The proposed Modification to the DA would not seek to alter any aspect of the signage structure, external lighting system or operating hours. As such there would be no alteration to the current approval. The proposal is compliant from a heritage perspective with the State Environmental Planning Policy (Precincts—Eastern Harbour City) 2021, State Environmental Plan Policy (Industry and Employment) 2021 and Glebe Island Silos Advertising And Signage Development Control Plan 2004, which is addressed in Section 6.4, Section 6.5 and Section 6.6 below. It should be noted that the development of The Bays Precinct is a long-term project with no significant change to its current land use envisaged prior to the 2030s which would render the continued display of signage on the Silos as unsuitable.

- **Will the signage visually dominate or obscure the heritage item or streetscape of a heritage area?**

Comment: No, the signage will not dominate or obscure heritage items or streetscapes in the vicinity. Whilst the Silos are visible from residential areas of Balmain, Glebe, Annandale and Pyrmont they do not alter the appreciation of any aspects of heritage significance. The Silos are emblematic of the working harbour – a reminder of the working harbour and trading port. The signage is located at the upper Section of the structure within the location identified in the Glebe Island Silos DCP. The signage is limited to the southern and western sides of the Silo structure facing busy public roadways. The elevations of the Silos that retain the “undecorated” industrial character, generally face onto the residential areas of the Balmain peninsula which lie in close proximity to the subject heritage item, heritage conservation areas of Balmain and White Bay Power Station, a State-listed heritage item.

- **Can the signage be externally illuminated rather than internally illuminated?**

Comment: The signage lighting will continue to be an external illumination type in accordance with the current operating approval. The lighting provides time restricted nighttime illumination using discrete structures with light spill only to the face of the signs. The lighting currently complies in full with the relevant requirements of SEPP (Industry and Employment) 2021 and AS4282. Refer to the lighting report prepared by Electrolight for full details of the lighting analysis.'

6.3.7.3 Conclusion

Having regard to the investigations that have been undertaken by NBRS and findings which are documented in the HIS that is reproduced in Appendix F it is our professional opinion that the continued display of the roof general advertising signage on the southern and western elevations of the Silos for an additional three (3) year term will not adversely impact on the heritage significance of the Silos structure or that of the adjacent heritage items.

6.3.8 Traffic, Cyclist and Pedestrian Safety

Bitzios Consulting has undertaken a Traffic Safety Assessment (TS)A to ascertain whether the existing signage and its continued display over a three (3) year term poses a threat to driver, cyclist and pedestrian safety. The results of this assessment are reproduced in full in Appendix I and the relevant extracts follow.

6.3.8.1 Review of Crash Data

To assess the crash history in proximity to the subject site, Bitzios Consulting obtained the relevant Crash Data for the Western Distributor, Victoria Road, The Crescent, Bank Street and Bowman Street from TfNSW. The relevant data is as follows.

'The most recent five years of crash data between 2019 and 2023 was obtained from Transport and used to assess the crash history within the driver practical viewing ranges to the signs. The practical viewing ranges to the signs are from approximately 455m south-west along the City West Link/ Victoria Road and 555m south-east along the Western Distributor. As per Rule 287 (3) of the Road Rules 2014, crashes are only recorded if they are reported to the police and when:

- *Any person is killed or injured.*
- *Drivers involved in the crash do not exchange particulars; or*
- *When a vehicle involved in the crash is towed away.'*

Bitzios Consulting then mapped the crash data by severity as detailed in Table 6.11. As shown, ten (10) crashes were recorded between 2019 and 2023 resulting in sixteen (16) casualties.

TABLE 6.1 CRASH SEVERITY IN PROXIMITY TO THE SITE (2019-2023)

Year	Crash Severity					Total
	Fatal	Serious Injury	Moderate Injury	Minor/Other Injury	Non-casualty (towaway)	
2019	-	1	1	-	2	4
2020	-	-	1	2	1	4
2021	-	-	1	1	1	3
2022	-	-	-	-	1	1
2023	-	1	1	1	1	4
Total	0	2	4	4	6	16

Source: Bitzios Consulting TSA 2025

In summary:

- No fatalities occurred.
- Three (3) crashes occurred eastbound towards the western elevation sign.
- Only one 'lane change left' crash occurred in front of the sign in November 2023 which resulted in a moderate injury.
- Of the thirteen (13) crashes that occurred westbound, the last crash was reported in October 2023 and ten (10) crashes were classified as 'rear end'.

Bitzios Consultancy has concluded that:

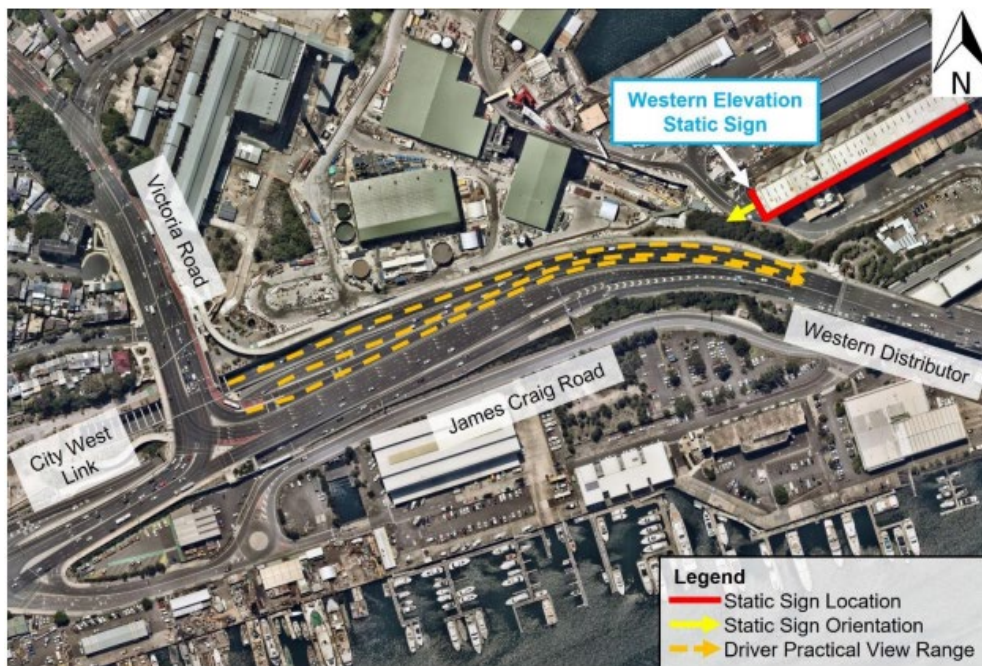
'The combined view locations findings indicate a low crash rate (around three (3) crashes per year) given the very high traffic volumes, moderate road complexity and a large number of visual stimuli through these areas. On this basis, drivers are likely to be at a heightened state of awareness moving through these areas and particularly the Rozelle Interchange which opened on 26 November 2023. The crash data suggests that the view locations are not inherently unsafe driving locations and that this would continue to be expected given no changes are proposed to the signs.'

6.3.8.3 Driver Viewing Locations

Bitzios Consulting analysed the main driver viewing approach locations for the signs. Refer Figure 6.4 and 6.5. The results of this analysis are detailed in full at Appendix I of this SEE. The relevant extracts are reproduced below:

'The western elevation sign faces south-west towards eastbound drivers on the City West Link and Victoria Road. The southern elevation sign faces south-east towards westbound drivers on the Western Distributor via the Anzac Bridge, and on Bank Street and Bowman Street.'

FIGURE 6.4 DRIVER VIEWING RANGES TO THE WESTERN ELEVATION OF THE SIGN



Source: Bitzios Consulting TSA 2025

FIGURE 6.5 DRIVER VIEWING RANGES TO THE SOUTHEASTERN ELEVATION OF THE SIGN



Source: Bitzios Consulting TSA 2025

The full range of driver views to the signs are illustrated in Figures 6.6 to 6.13 of the Bitzios Consulting Traffic Safety Assessment in Appendix I.

Based on a preliminary review of six (6) viewing locations and sightlines Bitzios consulting concluded that only four (4) sign view locations were worthy of further assessment for driver distraction influences. These are:

- City West Link eastbound.
- Victoria Road eastbound.
- Victoria Road tunnel eastbound.
- Western Distributor westbound.

Bitzios Consulting's day and nighttime assessment of these four driver views follows.

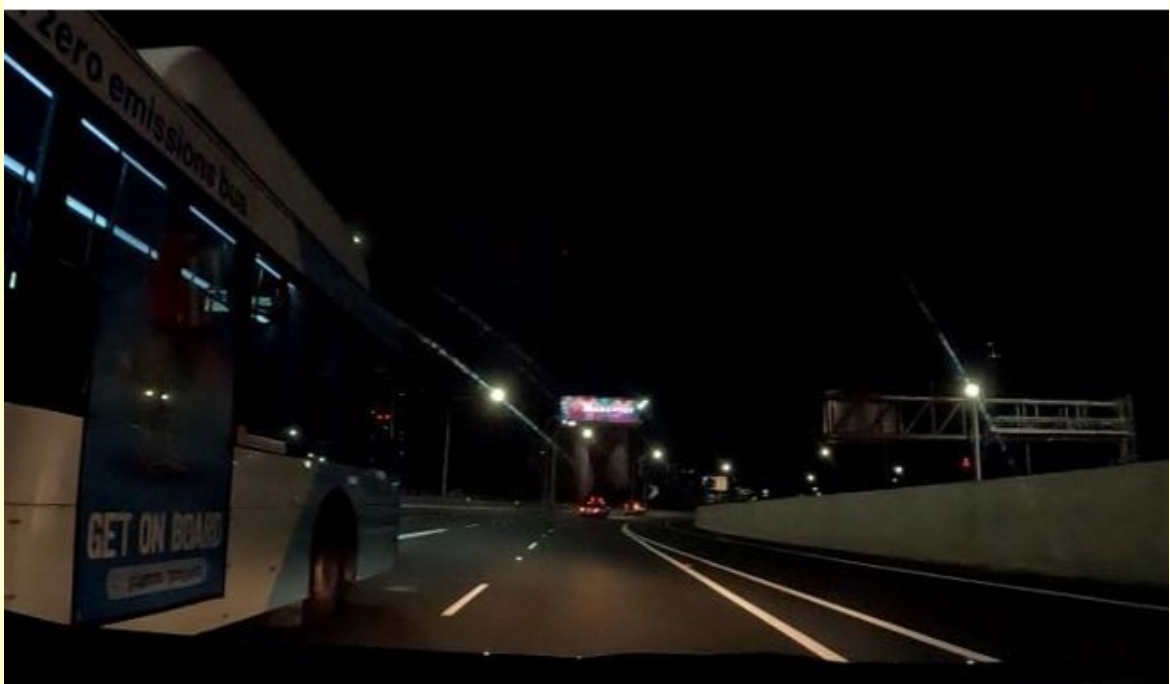
'2.3.1 City West Link Eastbound

The driver views to the western elevation sign from the City West Link eastbound during the day and night-time periods are shown in Figure 6..6 and Figure 6.7 respectively.

FIGURE 6.6 DAYTIME VIEW FROM CITY WEST LINK EASTBOUND



FIGURE 6.7 NIGHTTIME VIEW FROM CITY WEST LINK EASTBOUND



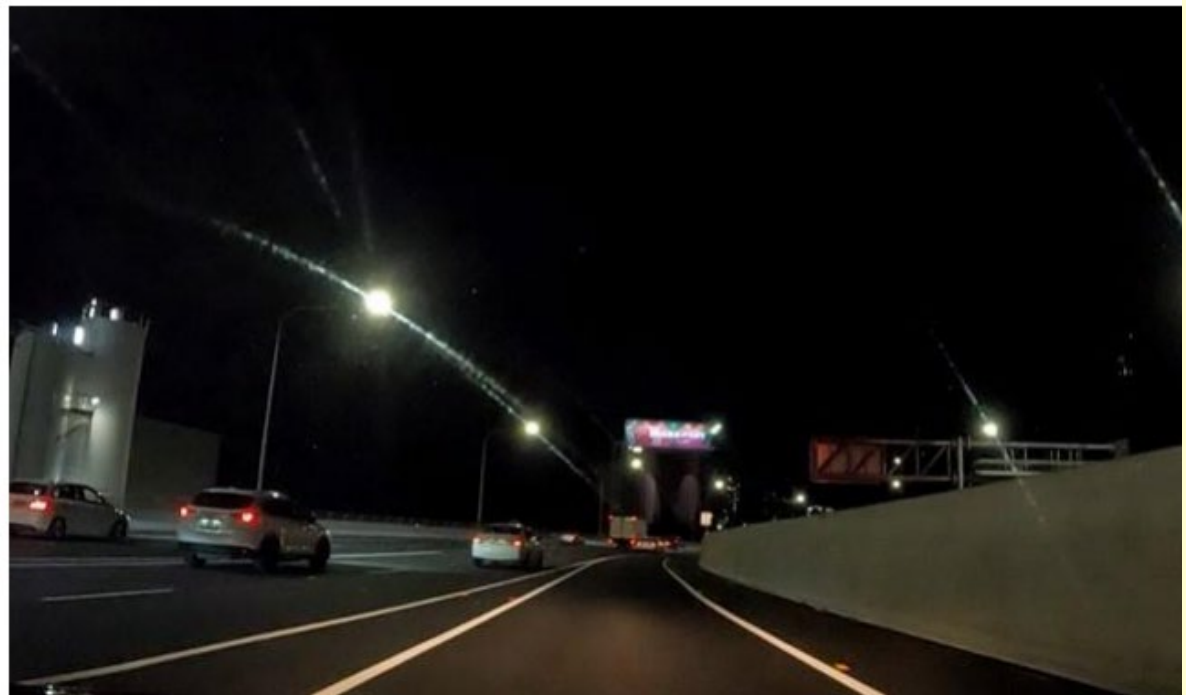
2.3.2 Victoria Road Eastbound

The driver views to the western elevation sign from Victoria Road eastbound during the day and nighttime periods are shown in Figure 6.8 and Figure 6.9 respectively.

FIGURE 6.8 DAYTIME VIEW FROM VICTORIA ROAD EASTBOUND



FIGURE 6.9 NIGHTTIME VIEW FROM VICTORIA ROAD EASTBOUND



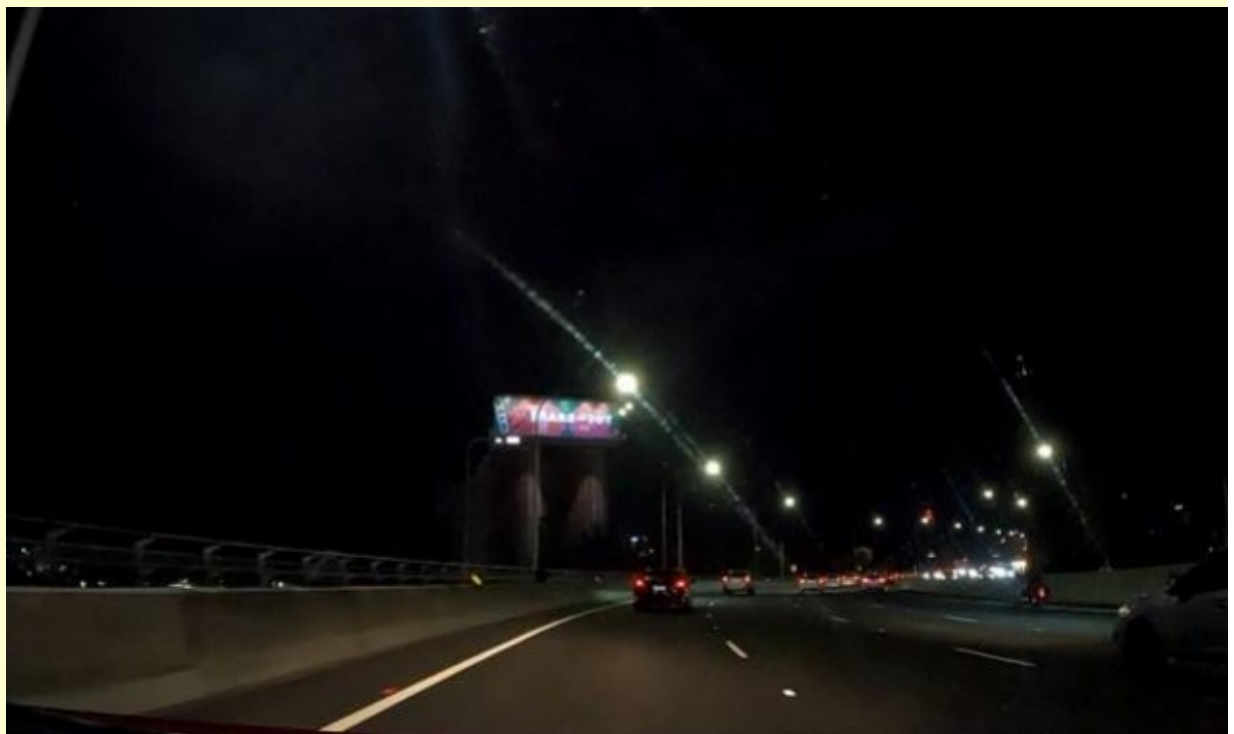
2.3.3 Victoria Road tunnel Eastbound

The driver views to the western elevation sign from the Victoria Road tunnel eastbound during the day and night-time periods are shown in Figure 6.10 and Figure 6.11 respectively.

FIGURE 6.10 DAYTIME VIEW FROM VICTORIA TUNNEL EASTBOUND



FIGURE 6.11 NIGHTTIME VIEW FROM VICTORIA TUNNEL EASTBOUND



2.3.4 Western Distributor Westbound lane 1

The driver views to the southern elevation sign from the Western Distributor westbound lane 1 during the day and night-time periods are shown in Figure 6.12 and Figure 6.13 respectively

FIGURE 6.12 DAYTIME VIEW FROM WESTERN DISTRIBUTER WESTBOUND LANE 1



FIGURE 6.13 NIGHTTIME VIEW FROM WESTERN DISTRIBUTER WESTBOUND LANE 1



Source: Bitzios Consulting TSA 2025

6.3.8.5 Strategic Transport Initiatives in the Locality

Bitzios Consulting was asked to examine whether the proposal would impact on transport initiatives specified in the:

- Bays West Place Strategy 2021 and Structure Plan; and
- Bays West Place Based Transport Strategy

The relevant extract from the TSA is reproduced below:

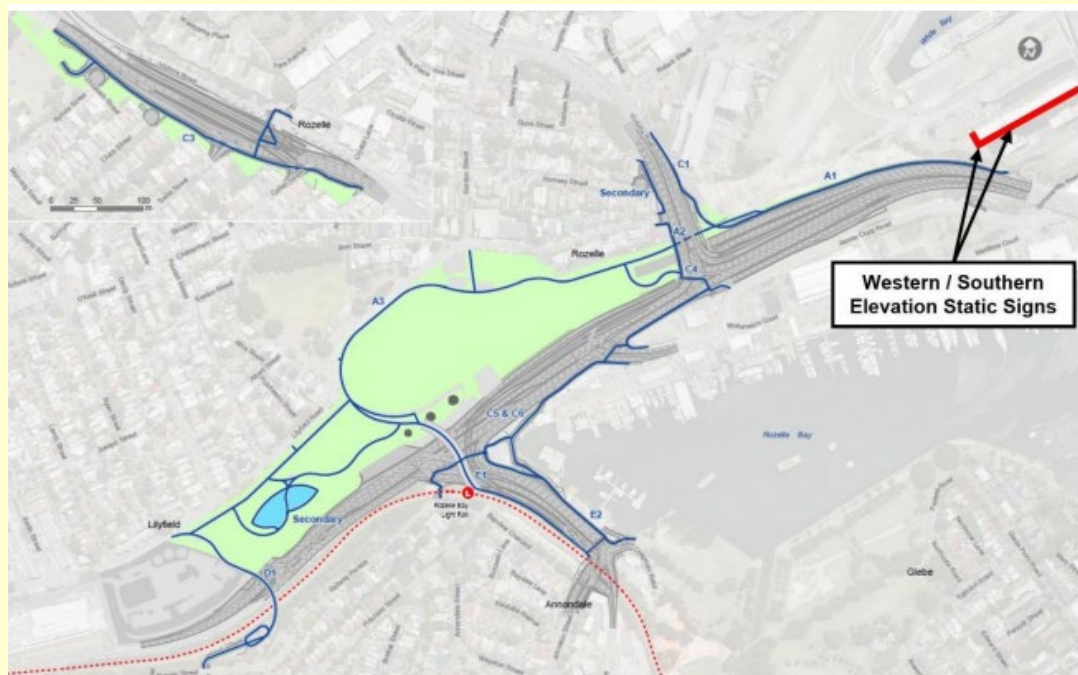
BAYS WEST PLACE STRATEGY 2021 AND STRUCTURE PLAN

'Existing land uses in Bays West include maritime, industrial, port and commercial uses along the waterways and foreshores. Other land uses near the White Bay Power Station include mixed industry, working harbour uses and transport connections. The Place Strategy included the (now open) Rozelle Parklands (former Rozelle Rail Yards), which includes the Rozelle West Motorway Operations Complex, sporting facilities, vast public open space, wetlands, playground and gardens. Internal and external pedestrian and cyclist links were also provided through a shared Victoria Road underpass to the Anzac Bridge shared path, as well as additional bridges over the City West Link to allow for increased accessibility.'

'The static advertising signage is not expected to have any impacts on these active transport links. Much of the existing precinct is not accessible to the public and has limited road access. Key areas include Glebe Island, White Bay, Blackwattle Bay and Rozelle Bay.'

Refer to Figure 6.14.

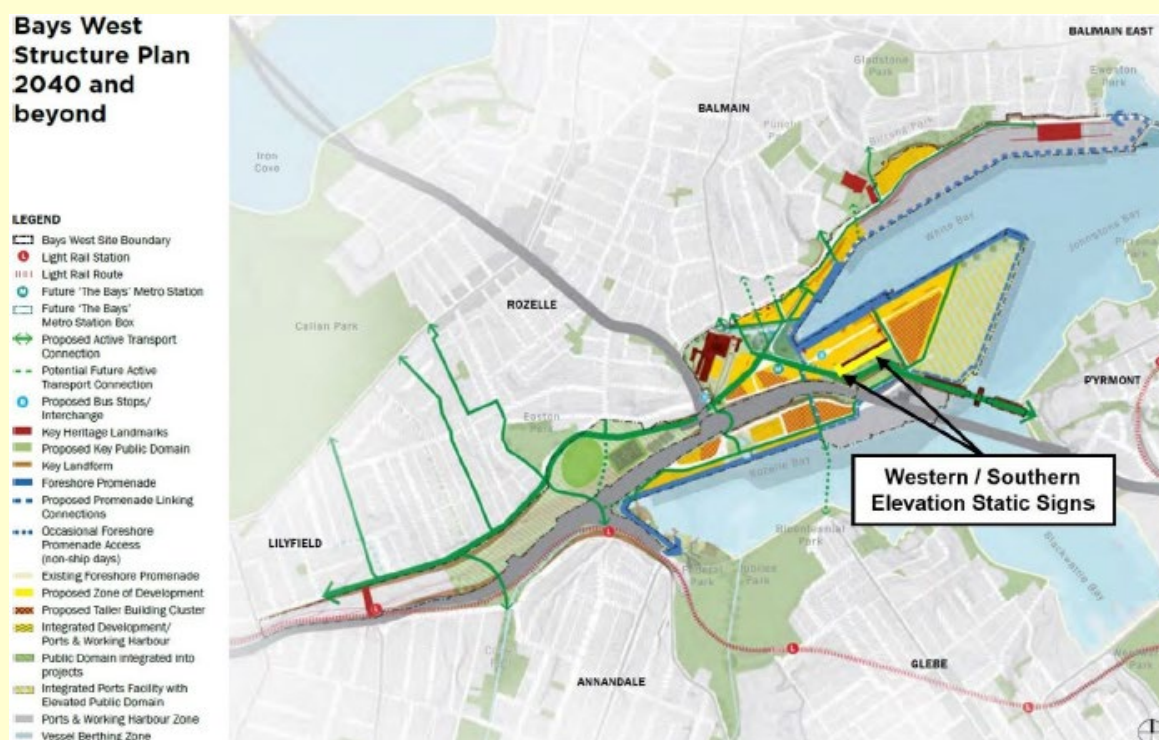
FIGURE 6.14 ROZELLE INTERCHANGE ACTIVE TRANSPORT NETWORK



'The Bays West Structure Plan does not propose any major road works within the vicinity of the signage. The Plan is intended to promote walking and cycling and to discourage dependence on private vehicles. Refer to Figure 6.15.'

Overall, none of the traffic and transport-related initiatives identified in the Place Strategy and its Structure Plan are affected at all by the advertising signs.'

FIGURE 6.15 BAYS WEST STRUCTURE PLAN'S RESPONSE TO TRANSPORT AND MOVEMENT



BAYS WEST PLACE BASED TRANSPORT STRATEGY 2022

3.2.1 Transport Vision

....

The precinct's vision is to improve walking and cycling networks and lower car use with plans for dedicated cycleways, shared paths and pedestrian crossings. It establishes links within Bays West, including to the Glebe Island Silos, and the surrounding regions through increased active and public transport access and connections. The strategy would perform an integration with existing infrastructure, including potentially reactivating the disused Glebe Island Bridge as a major active transport corridor between Rozelle and Pyrmont. The precinct will evolve the transport network to accommodate the increased demand while implementing low (or zero) carbon principles.

3.2.2 Walking and Cycling

Walking and cycling will be the key transport modes in the precinct and must be encouraged and supported from day one. This will also need to consider the future opportunities presented by the Glebe Island Bridge.'

6.3.9.6 Conclusion

The conclusion reached by Bitzios Consulting concerning the suitability of the proposal from a traffic and transport perspective is reproduced below.

- *'The signs are externally illuminated and will not change in terms of their existing sizes, locations and orientations*
- *The signs do not obstruct or interfere with the view of or restrict sight distance to any intersections, traffic control devices, vehicles, pedestrians or cyclists given their raised locations on the roadside*
- *The signs have been there for many years, and for most drivers would be part of the inconsequential driving background. It would be a rare event for them to be purposefully glanced to by a passing driver*

- *There is no evidence that the signs have in the past reduced the safety of any vehicles, pedestrian or cyclist movements. It is unlikely that they would have reduced movement safety previously, or would in the future, because they are located within a driver's ordinary field of view and only require glance appreciation with a small vertical deviation angle from vehicles ahead*
- *A review of available five years of crash data within 555m of the site showed a low crash rate within the viewable sight distance to the signs. This is an inherently low crash risk location, most likely because it is a location that demands (and receives) high driver attention, particularly due to the Rozelle Interchange*
- *The signs comply with the requirements of the Industry and Employment SEPP, Transport for NSW Advertising Sign Safety Assessment Matrix and Transport Corridor Outdoor Advertising and Signage Guidelines.*

Given the above conclusions, the ongoing display of the signs should be approved'

Based on the findings of the Bitzios Consulting assessment it is our professional opinion that there are no matters that would give rise to adverse traffic, cyclist or pedestrian safety condition arising from the continued display of the existing signage on the western and southern elevations for a further three (3) year term.

6.4 Section 4.15 (1) (c) Suitability of the Site for the Development

The signage, together with the structural signage system, are designed in a manner that is sympathetic to the character of the Silos and the industrial and maritime character of the Port Authority land. The ongoing display of signage on the upper parapet of the western and southern elevations of the Glebe Island Silos can occur without impacting the to the functionality and role of the Silos in the maritime and industrial precinct of White Bay and Glebe Island.

The Bays West Place Strategy anticipates the broader renewal of Bays West, including the Glebe Island Silos within Sub Precinct 3, from 2040 and beyond. The Place Strategy recognises Glebe Island Silos as an iconic element which reinforces the distinctive industrial maritime character of Bays West. The Silos will be retained and opportunities exist for continuation of existing uses and/or introduction of new uses.

The Stage 1 (Sub-Precinct 1) Master Plan and the Rezoning Package for the White Bay Power Station and Metro was finalised in December 2022. This is the first of the 10 Sub-Precincts in Bays West to undergo master planning and rezoning. It is envisaged other stages will be developed over time, with an integrated port facility being delivered later. Residential development planned as part of Stage 1 works will be unlikely to occur in the next three (3) years given that the Master Plan and Rezoning package was only approved in December 2022 and development consent will need to be obtained. This view is supported by the DPHI. Therefore, the subject site remains a suitable location for the ongoing display of the roof signage for the immediate three (3) years.

The signage complies in full with the development standards contained in the Glebe Island Silos Advertising and Signage DCP 2004. The DCP was prepared and adopted specifically to provide for the erection of a landmark general advertising display on the parapet of the Silos. The advertising structure is lower than the highest part of the former grain Silos and no wider than any part of the structure.

The impact of the signage on the heritage significance of the Silos has been assessed by NBRS Architects and it has been determined that the display of signage on the Silos represents as successful adaptive reuse of the heritage item. More than 50% of the Glebe Island Silos (the northern and eastern elevations) remain in original visual condition, that is "undecorated" and are not impacted by signage on the structure. This enables the public to interpret the original use of the Silos, which was for the storage of grain and cement. It is in line with heritage practice to maintain at least 50% of a heritage item in its original condition. The existing signage structure is a minor addition to the original fabric and is readily reversible. This is in accordance with heritage best practice principles.

A structural assessment has been undertaken of the steel sign framing signage structure and has determined that the southern and western framing systems are structurally adequate and compliant with the relevant Australian Standards.

In our professional opinion the display of roof signage on the southern and western elevations of the Silos for a further three (3) term continues to be a suitable use of the site.

6.5 Section 4.15(1)(e) Public Interest

After fully considering all aspects of the proposal it is our professional opinion that extending the duration of the consent for an additional three (3) years is in the public interest for the following reasons:

- The proposal incorporates a Public Benefit in the form of a significant monetary contribution that will continue to be paid annually by Eye Drive Sydney (or its Parent Company) to the Inner West Council towards the Heritage Conservation works
- It will not result in any significant adverse impact. This has been confirmed by robust independent investigations into visual impact, heritage impact, traffic safety, ecology and illumination.
- It can be supported on strategic and statutory planning and policy grounds and raises no matters of non-compliance.
- It will enable the Port Authority and Eye Drive Sydney to realise the commercial term of the current lease agreement.
- It will not impede the working of the port in servicing the NSW Infrastructure supply chain.
- It is unlikely, given the current strategic planning status, that any residential development will occur in the area surrounding the advertising signage (Stage 1 of the Bays West Bays West Place Strategy) within the next three years (3) years. Therefore, a three (3) year extension will not compromise the NSW Government's strategic planning intent for the Bays West Precinct.

7. CONCLUSION AND RECOMMENDATION

The Glebe Island Silos have proven to be a highly successful landmark advertising location for the past 32 years. The proposed Modification to extend the consent duration of DA 21/13182 for a further three (3) years is considered appropriate and acceptable for the following reasons:

- Effective outdoor advertising requires a site that provides a high daily exposure to motorists and commuters. The Glebe Silos are located adjacent to a significant arterial road network that incorporates the Anzac Bridge.
- The appearance of the advertising structure will not change as a result of the Modification. No physical works are proposed. The Modification seeks a legal change to enable the duration of the consent for a further three (3) year term. This is well within the maximum ten (10) year duration for roof advertisements provided for under Chapter 3, Clause 3.19 of IESEPP 2021.
- The application is submitted under Section 4.55(2) of the EP&A Act, 1979. The use of Section 4.55 is the appropriate planning application for the proposed extension of the duration of the consent for a further three (3) years. This has been discussed and justified within this SEE. The consent authority has previously, on two separate applications, endorsed and approved extensions to the duration of a previous development consent using Section 4.55. The proposal is substantially the same development as that approved on the 9 September 2022 by the Independent Planning Commission (IPC), acting as delegate for the Minister for Planning and Public Spaces and this is supported by a legal opinion which has been provided as part of the application. Refer to Appendix B.
- Independent and robust investigations into traffic safety, visual impact and illumination have confirmed that there are no adverse amenity impacts arising from the display of the signage for an additional three (3) years.
- The impact of the signage on the heritage significance of the Silos has been assessed by NBRS and it has been determined that the display of signage represents a successful adaptive reuse of the heritage item.
- Ecological impacts on local fauna have been assessed as part of an ecology assessment by Cumberland Ecology which has concluded that there is no adverse impacts on either birds or bats within the vicinity of the site.
- A structural assessment has been undertaken of the steel sign framing signage structure and has determined that the southern and western framing systems are structurally adequate and compliant with the relevant Australian Standards.
- The proposed extension to the duration of the consent will not alter the existing public benefit agreement that will continue to deliver to the Inner West Council an annual monetary contribution to be used to for local heritage conservation.
- The continued display of the signage is supported on strategic and statutory planning and policy grounds and raises no matters of non-compliance.
- An extension to the consent duration will enable the Port Authority and Eye Drive Sydney to realise the commercial term of the current lease agreement.
- The signage has existed on the parapet of the Silos for 32 years and it can satisfactorily coexist on the structure without impeding the workings of the Glebe Island Port.
- The compatibility of the signage with future land uses has been thoroughly explored. There is little to no likelihood of any new residential development being delivered under the Bays West Precinct Stage 1 rezoning within the next three (3) years. A three (3) year extension will not

impact the planning and development timeline for the release of any further rezonings within the Bays Precinct including the 2025 Bays West TOD rezoning.

- The signage reinforces the landmark quality of the Silos structure, and the proposed Modification will prolong its role as an iconic out of home advertising asset that is sought after by global entities seeking premium brand promotion.

The proposal to modify development consent DA 21/13182 represents a well-considered and desirable outdoor advertising and asset management outcome.

It is our professional opinion that the proposal to extend the consent duration of the roof advertisements that are displayed on the southern and western elevations of the Glebe Island Silos should be favourably considered and the development consent modified accordingly.

Yours faithfully,



Belinda Barnett

Director, Urban Concepts

APPENDICES

APPENDIX A – DEVELOPMENT CONSENT DA21/13182

APPENDIX B – LEGAL ADVICE FROM NORTON ROSE FULLBRIGHT

APPENDIX C – COPY OF PLANS BY ARCADIS

APPENDIX D – PRE-APPLICATION MEETING MINUTES WITH DPHI

APPENDIX E – VISUAL IMPACT ASSESMENT REPORT BY URBIS

APPENDIX F – HERITAGE IMPACT STATEMENT REPORT BY NBR

APPENDIX G – EXISTING PUBLIC BENEFIT AGREEMENT

APPENDIX H – LIGHTING IMPACT ASSESSMENT REPORT BY ELECTROLIGHT AUSTRALIA

APPENDIX I – TRAFFIC SAFETY ASSESSMENT BY BITZIOS CONSULTING

APPENDIX J – ECOLOGICAL IMPACT ASSESSMENT REPORT BY CUMBERLAND ECOLOGY

APPENDIX K – STRUCTURAL CERTIFICATION BY LEWIS CONSULTING STRUCTURAL ENGINEERS

URBAN CONCEPTS STATEMENT OF ENVIRONMENTAL EFFECTS, S.4.55(2) MODIFICATION APPLICATION GLEBE ISLAND SILOS

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