

7 April 2021

2200249

Anthony Witherdin
Director, Key Sites Assessments
Department of Planning, Industry and Environment
12 Darcy Street,
PARRAMATTA NSW 2150

Attention: Rodger Roppolo, Senior Planning Officer

Dear Rodger,

REQUEST FOR FURTHER INFORMATION - DA 10642 for SEPP 64 ADVERTISING SIGNAGE PROPOSED AT THE EASTERN DISTRIBUTOR, WOOLLOOMOOLOO


This letter has been prepared by Ethos Urban on behalf of Sydney Trains in response to the Request for Further Information (RFI) received for DA 10642 which is currently under assessment by the Department of Planning, Industry and Environment (DPIE) and is part of a series of Crown Development Application's (DA) under Part 4 Division 4.6 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) submitted to DPIE. DPIE issued a second RFI dated 15 March 2021 which outlined two key matters to be addressed:

- Public benefit; and
- Visual impact.

A response to the RFI is provided in **Table 1** of this letter.

Table 1 Response to Submissions

| Submission Comment | Applicant Response |
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| DPIE | |
| 1. Public Benefit The Department does not consider the RtS acceptable in meeting the requirements for the public benefit test as required by the Transport Corridor Outdoor Advertising and Signage Guidelines. It must be clearly demonstrated how the contribution will be linked to improvements in services and facilities for the local community, such as: <ul style="list-style-type: none">• improved traffic safety (road, rail, bicycle and pedestrian)• improved public transport services• improved public amenity within, or adjacent to, the transport corridor• support school safety infrastructure and programs• other appropriate community benefits such as free advertising time to promote a service, tourism in the locality, community information, or emergency messages. | <p>Sydney Trains advise that advertising assets within Sydney Trains transport and rail corridors generate revenue for Sydney Trains that can be used to fund upgrades to essential public infrastructure and other rail programs that allow for the maintenance and operations of the wider Sydney Trains network throughout Greater Sydney. These commercial arrangements provide a valuable on-going revenue stream to Sydney Trains from external 3rd party markets (ie the advertising market), with the assets intended to be privately leased for display purposes. Importantly, as Sydney Trains (through TfNSW; Sydney Trains is a NSW Government agency) maintain and operate a rail service throughout Greater Sydney, the projects supported by the operation of these assets are spread across larger areas across the entire rail network. These projects can range from station platform upgrades to safety improvements across the network as a whole.</p> <p>There are, however, several projects being delivered by Sydney Trains that would benefit the local community, including the future roll-out of 'gap buffers' within CBD stations located close to the subject site. Other projects underway include the Transport Access Program, which will benefit both the local community and broader community when travelling to railway stations that do not currently provide access (via lifts, new canopy covers, upgraded footpaths and improvements to wayfinding) for persons with a disability,</p> |

| Submission Comment | Applicant Response |
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| | <p>limited mobility, carers/parents with prams and customers with luggage, through the provision of lifts. Local residents near to the subject site may travel to stations that lack these facilities and the Transport Access Program will therefore provide a benefit to those residents when attending those stations.</p> <p>Furthermore, digital advertising provides a further public benefit to Sydney Trains, TfNSW and emergency services to display instantaneous safety or public awareness messages. In addition to a revenue stream, the digital screens will also be used to provide important information to customers and the general public in the event of the following:</p> <ul style="list-style-type: none"> • Station emergency situations; • Any major disruption which is likely to cause delays to train running times; • Sydney Trains and TfNSW promotions and events; and • Threat-to-life alerts by NSW Government Emergency and Police Agencies. <p>This public benefit for Sydney Trains, TfNSW and emergency services to access digital screens to provide instantaneous messaging to Sydney Trains users is a significant component of the digital program to provide a benefit to the public in certain locations around Sydney.</p> <p>In addition, as outlined below, Sydney Trains is willing to engage with local residents and the City of Sydney in relation to possible provision of additional tree planting to manage interface matters at the western end of Harmer Street. That engagement process could result in a positive public benefit for local residents within 85 Bourke Street in particular should residents and the City of Sydney (land owner) support such planting.</p> |
| <p>2. Visual Impact</p> <p>(a) To mitigate any visual impact of the proposal on the habitable room windows located along the southern elevation of 85 Bourke Street, the Department is recommending that mature tree planting is provided within the road reserve at the end of Harmer Street (as highlighted in yellow below). Please advise if you are the landowners of the site and raise any concerns with the Department's recommendation.</p>  | <p>It has been confirmed by the project's surveyors that this land sits within City of Sydney ownership and as such Sydney Trains are unable to provide planting in this location without the land owners consent.</p> <p>Further, following a site visit, it would appear that local residents have planted a small community garden in this space, and as such any tree planting could need to be agreed with those residents, along with the City of Sydney.</p> <p>Sydney Trains is willing to engage with the local residents and Council to identify appropriate planting that could be provided in this location. Accordingly, Sydney Trains would be accepting of a condition of consent that requires this consultation to be undertaken prior to construction commencing. The draft wording of such a condition is provided as follows:</p> <p><i>Within 3 months of commencement of operation of the advertisement sign, Sydney Trains is to have commenced consultation with the City of Sydney Council (as the landowner) to identify an appropriate landscaping/planting outcome for the deep soil landscaping space at the western end of Harmer Street, with the intention to provide possible visual screening of the sign. Any planting must be satisfactory to both parties, with local community input as appropriate. Should agreement on the planting and its provision not be reached within 12 months of commencement of operation of the advertising sign, or it is agreed by both parties that the</i></p> |

| Submission Comment | Applicant Response |
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| | <i>planting is not necessary or appropriate in this instance, this condition will be deemed to be satisfied.</i> |
| (b) Figure 1 within the VIA addendum shall be updated to include the location of all viewpoints. | Refer amended figure within the VIA addendum. |

We trust that the information provided in this response addresses the matters raised by DPIE and allows the planning assessment to proceed. Should you have any queries please do not hesitate to contact the undersigned.

Yours sincerely,



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