

27 May 2021

2200249

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

Attention: Cameron Sargent (Team Leader, Key Sites Assessments)

Dear Cameron,

AMENDED DEVELOPMENT APPLICATION AND RESPONSE TO SUBMISSIONS – DA 10662 for SEPP 64 ADVERTISING SIGNAGE PROPOSED AT HELP STREET, CHATSWOOD

1.0 Introduction

This response to submissions letter has been prepared following the public exhibition period for DA 10662 which is currently under assessment by the Department of Planning, Industry and Environment (DPIE) and is part of a series of Crown Development Applications (DA) under Part 4 Division 4.6 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) submitted to the DPIE.

During the exhibition period, a number of submissions were received by the relevant agencies including Willoughby City Council, as well as 63 public submissions. DPIE have specifically asked for a detailed response that clearly addresses all concerns raised in the submissions as part of their Request for a Response to Submissions (RTS) email dated 16 February 2021 and have also requested a formal Request for Further Information (RFI) in their letter dated 12 March 2021.

This letter is supported by the following documents:

- Amended Signage Plans prepared by Ethos Urban (**Attachment A**);
- Addendum Lighting Report prepared by Lighting, Art & Science (**Attachment B**);
- Addendum Traffic Assessment prepared by TTPP (**Attachment C**); and
- Addendum Visual Impact Assessment prepared by Ethos Urban (**Attachment D**).

This response seeks to amend the application per Clause 55 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Reg) in response to commentary received from agencies and public submissions. Refer to **Section 2** below.

A response to the DPIE request for additional information as well as a response to each agency submission and a response to the public submission topics are also provided in **Section 3** and **4** of this RTS. Additional environmental assessment, where required, has been completed in **Section 5**.

2.0 Amended Description of Proposed Development

The application is to be amended to remove the eastern sign (as originally proposed) and retain the western sign. As such, the amended DA now only seeks approval for the installation of one digital advertising sign proposed on the western elevation of the existing railway bridge. Signage supporting structure including framework, wiring, electrical and communications is still proposed for the western sign.

The amended development described above is outlined in **Table 1** below. The previous description of the development proposed to be deleted are shown in ~~**bold strike through**~~ and words to be inserted are shown in ***bold italics***.

Table 1 Description of Previous and Amended Development

Location	Materiality and Construction	Proposed Dimensions	Illumination
Eastern Elevation	Visual digital display board affixed onto an ACM-cladded backboard.	<ul style="list-style-type: none"> 12.4m (w) x 3.2m (h) visual display board 15.5 (w) x 3.3m (h) ACM-cladded backboard support 	Yes
Western Elevation	Visual digital display board affixed onto an ACM cladded backboard.	<ul style="list-style-type: none"> 12.4m (w) x 3.2m (h) visual display board 15.5 (w) x 3.3m (h) ACM cladded backboard support 	Yes

Amended Signage Plans which identify the removal of the eastern sign have been prepared by Ethos Urban and is provided at **Attachment A**.

3.0 Agency Submissions

There were three submissions made by public authorities, being the DPIE, Transport for NSW and Willoughby City Council. Key themes identified throughout these submissions relate to:

- Impact on surrounding residents;
- Visual impact;
- Traffic and Road safety; and
- Compliance and consistency with relevant statutory plans.

Transport for NSW did not provide comment, rather requested DPIE ensure the proposal was consistent with State Environmental Planning Policy 64 – Advertising and Signage (SEPP 64) and the Transport Corridor Outdoor Advertising and Signage Guidelines 2017 (the Guidelines).

Responses to each of the submissions are outlined in **Table 2** on the following page.

Table 2 Response to Agency Submissions

Submission Content	Applicant Response
DPIE RFI dated 12 March 2021	
<p>Residential Impacts</p> <p>The Department has further reviewed the proposal, Visual impact Assessment and Evaluation of Lighting Impact and is concerned with the following:</p> <p>The digital advertising is approximately 40m from windows and balconies of 140 units at 2A Help Street and the constantly changing illuminated imagery which is clear from habitable rooms and balconies will likely have adverse effects on the residents. The illumination levels and hours of operation should be reconsidered to reduce the impact on these residents. When considering the information provided against the assessment criteria in Schedule 1 of SEPP 64, particularly: criteria no.2 - '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?', and criteria no.7 - 'Would illumination detract from the amenity of any residence or other form of accommodation?', the Department is not satisfied the proposal is acceptable in terms of its design or public benefit as required by Clause 13(2)(b).</p>	<p>In response to the submissions received, the applicant has significantly revised the proposed works in DA 10662 as outlined above, which result in the removal of the eastern sign. This is considered to resolve the highlighted issues regarding impacts on residential amenity.</p>
<p>Pedestrian and Driver Safety</p> <p>The Department is concerned with the impacts of the proposal on both pedestrian and driver safety. In particular, the following needs to be addressed:</p> <p>The proximity of the proposed digital signs to the pedestrian crossings and traffic signals at the intersections of both Help Street and Orchard Road to the east and Help Street and Railway Street to the north is of concern to the Department. The size and nature of the proposal has the potential to distract drivers on approach to the crossings, impacting both driver and pedestrian safety.</p> <p>The western elevation is within the 35m safe stopping distance of the stop line at Orchard Road and, whilst at an oblique angle, dependant on vehicle type and car interior, is visible for the first 10m of the safe stopping distance. This is not compliant with the Transport Corridor Outdoor Advertising Guidelines (3.2.3) and (3.3.1) which state:</p> <p><i>3.2.3 (a) The sign should not be located:</i></p> <ul style="list-style-type: none"> <i>i. less than the safe sight distance from an intersection, merge point, exit ramp, traffic control signal or sharp curves</i> <i>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</i> <i>iii. so that it is visible from the stem of a T-intersection.</i> <p><i>3.3.1 (a) 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.</i></p> <p><i>3.3.1 (b) The advertisement must not interfere with stopping sight distance for the road's design speed or the effectiveness of a prescribed traffic control device.</i></p>	<p>The proposed digital signage has been assessed in accordance with the Transport Corridor Outdoor Advertising and Signage Guidelines. There is a general perception of digital signage distracting motorists and causing an increase in the likelihood of crashes, however, TTPP demonstrate in Attachment C (through crash investigation data as well as other supporting studies) that there is no evidence that digital signs result in increased driver distraction and increased safety risk for motorists and pedestrians. The proposed removal of the eastern sign is considered to resolve the traffic issues relating to the pedestrian crossings and traffic signals at the intersection of Help Street and Orchard Road to the east of the railway bridge.</p> <p>TTPP, in their response at Attachment C, state that the proposed signage on the western approach is situated within the 35m safe stopping sight distance of the traffic signals at the signalised intersection. The signage is to be located on the western elevation of the railway bridge which is measured to be 25m away from the traffic signals. Therefore, for the first 25m of the safe stopping distance the signage is not visible to motorists at all since a driver will have physically passed the signage.</p> <p>Notwithstanding the above, there are several examples of digital and static signage boards in Sydney that are situated within the maximum safe stopping distance.</p> <p>Additionally, the amount of text and information displayed on the proposed digital signage will be kept to a minimum in accordance with the Transport Corridor Outdoor Advertising and Signage Guidelines. The Guidelines state the information and text presented should be no more than a driver can read at short glance. This is to ensure that all motorists would still be able to process the information shown on the surrounding traffic signals. The contents and images displayed on the proposed digital signage would not utilise colours and shapes (e.g. red, amber or green circles, octagons, crosses or</p>

Submission Content	Applicant Response
<p>The proposed western and eastern elevations are located behind traffic signals, which has the potential to cause distraction for drivers upon approach of the traffic signals. The location of the illuminated signage in this location does not seem appropriate, and the Department is concerned that it will have safety implications.</p> <p>When considering the information provided against Schedule 1, criteria no.8 which states 'Would the proposal reduce the safety for any public road?' and 'Would the proposal reduce the safety for pedestrians or bicyclists?' the Department is not satisfied the proposal is acceptable in accordance with Clause 13(2)(b).</p>	<p>triangles or shapes or patterns) that may result in the advertisement being mistaken for a traffic signal.</p> <p>It is also noted that the road network in this location is signposted as 40km/h High Pedestrian Activity Area. As such, motorists approaching the digital signage would have more time to observe and react to pedestrians crossing the road.</p> <p>The sign is viewable within approachable motorist distances and the existing speed limit for the immediate road network is signposted at 40km/h. Given the urban nature of the surrounds, there are very clear existing visible cues to motorists that the surrounding area is high in pedestrian and other urban activity that would already cause drivers to be cautious of their surrounds. For this reason (coupled with the 40km/h speed limit and also the sufficient sightlines of the sign to motorists from a distance in both directions), it is considered that the proposed western sign would not create a reduction in safety for users (motorists, pedestrians, cyclists) of the urban environment beyond that of what currently exists.</p>
<p>Outdated Plans</p> <p>The Department has further reviewed the Evaluation of Lighting Impacts and has determined that the report has been prepared on outdated plans, dated July 2020. The July 2020 plans relied on within the Lighting Impacts report differ in display area size and sign location, being placed higher on the overpass structure, to the submitted proposed plans dated December 2020 that were lodged with the application. The Department requests that lighting impacts be assessed using the new proposed location of the signage.</p>	<p>Lighting impacts have been re-assessed against the most recent plans for the DA (noting only the western sign is now proposed) and an addendum lighting statement has been prepared and is provided at Attachment B.</p>
<p>Assessment Criteria</p> <p>The Visual Impact Assessment does not consider the impact on private domain or night-time impacts. As these are the main concerns with this proposal, the Department request that these impacts be adequately assessed and addressed within the Response to Submissions.</p> <p>Within the Statement of Environmental Effects' assessment against the Transport Corridor Outdoor Advertising Signage Guidelines, the incorrect assessment criteria is used. The SEE refers to the Free-Standing Advertisement Criteria instead of the Bridge Signage Criteria. The Department requests that an assessment against the Bridge Signage Criteria be undertaken and included in the Response to Submissions.</p> <p>The Department notes that the size of advertising display of each signs stated in the SEE is 39.68m². However, when calculated using the definition of 'advertising display area' within SEPP 64, 'the advertising structure used for signage, and includes any borders of, or surrounds to, the advertisement or advertising structure', the advertising display area of the proposed signage is 51.15m². The Department requests that any plans or documentation submitted as part of the Response to Submissions or in future is amended to reflect this.</p>	<p>Refer to the addendum VIA assessment located at Attachment D which includes an additional viewpoint for the western sign. As the eastern sign has been removed and the impacts to the residential towers to the east mitigated, this is considered to have been satisfied.</p> <p>Further assessment has been undertaken to address the proposals compliance against the Bridge Signage Criteria as stated in the Guidelines. Refer to Section 5.2.</p> <p>The plans submitted indicate that the visual display board component of the proposed signage (the area that will display the advertisement) is 12.4m by 3.2m, for a total display area of 39.68sqm. The plans also indicate that the total area of the sign including its side bars is 15.5m by 3.3m, for a total signage area of 51.15sqm. No further update to plans is considered necessary.</p>

Submission Content	Applicant Response
Willoughby City Council	
1. Impact on Residents	
<p>The bridge is located in close proximity to residential dwellings within the B4 Mixed Use zone to the east of the site. Location of the proposed sign on the eastern elevation of the Bridge will have a significant, adverse impact on residents in residential flat development located in this adjoining zones.</p> <p>The Bridge is located in close proximity to residents particularly in the residential flat building at 2A Help Street. While it is acknowledged that these properties are located adjacent to the railway line, the proposed signage will cause a significant intensification of visual pollution. The illuminated nature of the sign, the constantly changing imagery, its commercial nature, its proximity and its clear visibility from habitable rooms and balconies will have a unique, adverse impact that make it inappropriate in this location.</p>	<p>In response to the submissions received, the applicant has revised the proposed works in DA 10662, being the removal of the eastern sign entirely from the DA. This change to the application is considered to resolve the highlighted issues regarding impacts on residential amenity as the DA no longer proposes signage on the eastern elevation of the railway overpass structure.</p>
2. Traffic and Pedestrian Safety	
<p>There are pedestrian crossings at the intersection of Help Street and Orchard Road to the east of the bridge and at the intersection of Help Street and Railway Street to the north of the bridge. The proposed signage will cause distraction of these motorists approaching the crossings and will therefore increase danger to pedestrians.</p>	<p>The proposed signage is supported by a Road Safety Assessment prepared by TTPP. The Road Safety Assessment considers the signs proximity to the existing signalised traffic signs and found that an extended dwell time of 15 seconds is considered to be sufficient given the existing transport environment. The basis for this recommendation is the Land and Environment Court Case, <i>Outdoor Systems Pty Ltd v Georges River Council and Roads and Maritime Services [2017] NSWLEC 1505</i>. It is noted the application has been amended to remove the eastern sign.</p>
3. Breaches of State Environmental Planning Policy No. 64 – Advertising and Signage (SEPP 64)	
<p>The above issues will result in the proposal breaching the following provisions of SEPP 64:</p> <ul style="list-style-type: none"> • The objective in Clause 13(1)(a) that signage be compatible with the desired amenity and visual character of an area; • Item 2 Schedule 1 – the proposal will detract from the amenity or visual quality of any ... residential areas; • Item 4 Schedule 1 – the proposal will protrude above the bridge; • Item 7 Schedule 1 – the illuminated sign will adversely affect safety of pedestrians and vehicles at the pedestrian crossings; • Item 7 Schedule 1 – the illuminated sign will adversely affect the amenity of residential neighbours. 	<p>A full assessment has been undertaken with regard to the provisions contained within SEPP 64 as part of the original SEE. Nonetheless, in response to Council's submission, further assessment regarding the proposal's compliance with SEPP 64 is provided below in Section 5.1.</p>

4.0 Public Submissions

There were a total of 63 public submissions received from nearby landowners to the proposed signage, and the owners of Strata Plan 65600 65601 (Regency Apartments) at 2A and 2B Help Street also made a submission. The key themes raised within these submissions were:

- Illumination impact;
- Visual impact;
- Traffic and Road Safety Impacts;
- Residential Amenity;

- Inconsistency in documentation; and
- Signage Content.

A response to each of the topics outlined within the public submissions are outlined below in both **Table 3** and **Table 4**.

Table 3 Response to Strata Plan 65600 & 65601 Submission

Frequency	Submission Comment	Applicant Response
The Owners of Strata Plan 65600 & 65601 (Regency Apartments 2A & 2B Help Street, Chatswood)		
1. Inconsistencies within the supporting documentation		
Statement of Environmental Effects (SEE) and Visual Impact Statement (VIA)		
The Statement of Environmental Effects (SEE) and Visual Impact Assessment (VIA) have both failed to identify or acknowledge that there are residential units within close proximity to the sign.	The amended VIA is provided at Attachment D and further justification is provided at Section 5.3 noting that the proposal has been amended to remove the eastern sign facing the Regency Apartments.	
The size of the advertising display area of each of the signs is nominated in the SEE as being 39.68m ² when the actual advertising display area when calculated in accordance with the definition in Clause 3 of SEPP 64 is 51.15m ² .	The advertisement display area of the sign is 51.15m ² in accordance with Clause 3 of the SEPP 64. Despite this, the proposed signage is still compliant with Clause 19 as it is still located within transport corridor lands and are consistent with the Guidelines.	
Section 3.1 of the VIA identifies that the proposal seeks approval for both static and non-static signs, however the SEE only references static signs.	The proposed signage will be static but will be backlit via digital illumination devices. The sign will not contain any flashing, pulsating or moving images on the digital screens. The amended VIA has been updated accordingly noting that the eastern facing sign has been removed from the proposal.	
Failure to assess the relevant criteria under Department of Planning and Environment Transport Corridor Outdoor Advertising and Signage Guidelines (2017) (the Guidelines) being Section 2.5.5. Bridge Signage Criteria and address its non-compliances.	The proposed western signage is consistent with the requirements and controls outlined within the Guidelines (as amended by Table 4) in that it has been designed accordingly to not diminish the architectural features of the bridge. Additionally, the proposed sign will be contained entirely within the structural boundaries of the bridge and will not protrude above the topmost structures of the bridge or reduce the existing vertical clearance of the road. With this, the proposed signage does not block significant views for pedestrians or cyclists nor does it impede on passive surveillance. The bridge is not a road or pedestrian bridge, and a fall arrest system will be included as part of the detailed design phase and installation of the sign.	
The VIA identifies this non-compliance and acknowledges it has impacts stating the “ <i>visual impact of this location is not considered to be negligible from a visual perspective</i> ” but does not provide any mitigation measures or justification for this non-compliance		
Evaluation of Lighting Impacts		
The Evaluation of Lighting Impacts Report has been prepared based on outdated plans dated July 2020. The position of the sign proposed under the current plans is significantly higher than of the outdated plans. This change in position creates the non-compliances with the Bridge Signage Criteria of the Guidelines.	An Addendum Lighting Report has been prepared by Lighting Art and Science to assess the amended signage plans against the relevant standards and provisions, and provides that the curfew limit for the western facing sign will be 228cd/m ² (representing a 35% reduction to the allowable limit prescribed under SEPP 64). Refer to Attachment B for more details.	
The position of the Vertical Illuminance Elevation within the Lighting Impacts report is incorrect as the residential units extend beyond this area closer to the proposed sign. Given the Lighting Assessment has been based on outdated plans and incorrect information regarding the position of habitable rooms in residential units, it should not be relied upon to provide an accurate assessment of the impacts of the proposed sign.		
2. Failure to consider impact on neighbouring residential units		
Section 6.1 of the VIA specifically states that the assessment <u>excludes</u> any consideration on the impact of the signage on the ‘ <i>private domain or of night time impact including lighting</i> ’. This confirms that there has been no consideration given to the potential visual impact of the signage on the Regency	The Visual Impact Assessment has been amended to consider the impacts on neighbouring residential units (refer to Attachment D) noting however that the eastern sign has been removed from the proposal meaning no signage faces the Regency Apartments. Further assessment on the impact on	

Frequency	Submission Comment	Applicant Response
	<p>Apartments even though they are the closest building to the sign and contain 140 apartments that face directly onto the sign.</p> <p>Section 9.2 Table 15 of the VIA assesses the proposed sign against the criteria within the Guidelines and states that <i>'the proposal will not be visible from sensitive uses such as residential premises'</i> which is inaccurate and misleading</p> <p>Section 9.2 Table 17 of the VIA states that light spillage will not occur into any residential properties, however, this position is strongly challenged given the VIA has been prepared based on public domain views only and not at night time. The VIA fails to identify the 140 residential units within the Regency Apartments which are within 40 metres of the sign and therefore the potential for impact is significant.</p>	<p>neighbouring residential dwellings is provided in Section 5.3 below.</p> <p>In response to the submissions received regarding the impacts of the eastern sign on nearby residential buildings, this amending DA seeks to remove the eastern sign entirely from the scope of works proposed under this DA, and therefore resolves this concern.</p>
3. Inconsistency with relevant statutory plans		
	<p>The proposal is inconsistent with <i>Criteria 2 Special Areas, Criteria 3 Views and Vistas and Criteria 7 Illumination of Schedule 1 SEPP 64 Design Assessment Criteria</i>.</p> <p>In accordance with <i>Clause 3(2)</i>, the advertising display area was not accurately calculated and comes to a total of 51.15m². Due to this, the proposal is inconsistent with <i>Clause 19</i> of SEPP 64, which specifically relates to advertising display areas greater than 45sqm.</p>	<p>Despite the size of the sign being 51.15m², it remains permissible under Clause 19 of SEPP 64 as it is located within transport corridor land and is consistent with the Guidelines.</p>
4. Incompatible with the character of the area		
	<p>The size and position of the signs are inconsistent with the character of the area, which is predominately residential despite the mixed-use zoning. The signs each have an advertising display area of over 51m². There are no advertising signs of similar scale within this area and approval for this will set a precedent for other large-illuminated signs which will adversely impact on the character of the area.</p>	<p>The proposed signage is consistent with the ever-evolving mixed use nature of Chatswood, which has undergone extensive changes over recent years as it has intensified into a highly urban centre. The proposed signage is consistent with the relevant Australian standards and is also consistent with the other signage within the area, particularly those on Boundary Street, Victoria Avenue, and Pacific Highway. The sign is not a freestanding structure and is located on existing rail infrastructure.</p>
	<p>The residents of Regency Apartments advise that their lives are already impacted by the trains in the form of train noise, track works and station announcements and the introduction of the large-illuminated signs will add further disruption to their residential amenity.</p>	<p>The key change forming part of this amended DA includes the removal of the eastern sign which is considered to resolve the highlighted issues regarding impacts on residential amenity.</p>
5. Adversely impact on traffic and pedestrian safety		
	<p>The location of the Eastern sign is at a busy and confusing intersection for motorists and pedestrians with 4 lanes of through traffic along Help Street and a right turn into Orchard Road for east bound motorists. Orchard Road attracts a large number of buses due to its proximity to Chatswood bus interchange. The proposed sign will be visible within 10 metres of the intersection of Orchard Street and Help Street which is contrary of the Safe Stopping Sight Distance requirements under Ausroads guide.</p>	<p>Travel lanes and pedestrian crossings on all intersection approaches are clearly line-marked with guidance lines on approach to the proposed signage, removing any potential confusion on travel paths for motorists, bus drivers and pedestrians. Additionally, this amended DA proposes the removal of the eastern sign, which will resolve the expressed traffic concerns relating to the Help Street and Orchard Road intersection. Refer to the Addendum Traffic Assessment provided at Attachment C.</p>
	<p>The application relies on vegetation within the footpath to establish the Safe Stopping Sight Distance requirements for drivers travelling West along Help Street. As is the case for any development vegetation cannot be relied upon to provide a consistent visual barrier as there is no guarantee that the vegetation will not be removed or trimmed to a lower height at some point in the future. If approved, the signage will be permitted to remain installed for 15 years. It is inevitable that during this time there will be changes to the footpath</p>	<p>As part of this amended DA, the eastern sign is proposed to be removed, therefore resolving this traffic issue regarding vegetation and visual barriers.</p> <p>Further assessment has been undertaken in the Addendum Traffic Assessment prepared by TTPP at Appendix B.</p>

Frequency	Submission Comment	Applicant Response
	vegetation that will likely result in the Eastern sign being more visible to drivers travelling west on Help Street and for a longer period which would create a higher likelihood of distraction leading to increased safety issues for vehicles and pedestrians alike. This is of a particular concern given there is a School zone on Help Street within 115 metres of the proposed sign.	

Table 4 Response to public submissions

Frequency	Submission Comment	Applicant Response
Illumination Impacts		
21	<i>"These signs will be illuminated at a minimum from 6am to 11pm, 7 days a week and that will affect the residents of the Regency Apartment".</i>	The eastern sign has been removed from this DA and therefore, the DA as now proposed is unlikely to give rise to a significant impact upon residential amenity to the east.
16	<i>"The light emissions will significantly decrease our quality of life, especially at night"</i>	
Visual Impacts		
5	<i>"The advertising screens would be unsightly and will not be aesthetically pleasing on Help Street."</i>	Despite the eastern sign being removed as part of this amending DA, the amended VIA provided at Attachment D includes further assessment and consideration on the impacts to the residential apartments located at 2A and 2B Help Street.
1	<i>"The VIA states that "the amenity of the area is consistent with that of a busy, complex business district". While the west side of the railway is predominately business, the east side is entirely residential. The VIA also has not considered the impact on private domain or the night-time impacts."</i>	
Road Safety Impacts		
29	<i>"The signs will cause distraction to drivers and pedestrians at 2 already confusing and extremely busy intersections".</i>	Generally, there is a perception that a digital signage would cause an unsafe level of distraction for a motorist which is likely to result in a crash incident. The analysis undertaken by TTPP demonstrates that there is no evidence (through crash data and other supporting studies) that suggests digital signs result in increased driver distraction and increased safety risk for motorists and pedestrians.
4	<i>"Many accidents have occurred at this intersection and the proposed signage will result in many more"</i>	
3	<i>"The proposed advertisement runs contrary to the governments ongoing campaign to reduce accidents on the road and human injury"</i>	The eastern sign is proposed to be removed from this DA, therefore resolving the expressed traffic concerns relating to the Help Street and Orchard Road intersection.
3	<i>"This intersection is a major thoroughfare for school-children and the proposed signage will cause further distraction and lead to accidents at the road crossings on Help Street"</i> – Multiple local residents (Gloria Rudge and Lin Pan) and parent of student at school objectors including parent of student at local school (David Webb)	In relation to the western sign, the amount of text and information displayed on the proposed digital signage is regulated by the Guidelines, SEPP 64 and the Outdoor Media Association. The Guidelines state the information and text presented should be no more than a driver can read at short glance. This is to ensure that all motorists would still be able to process the information shown on the surrounding traffic signals. Also, the contents and images displayed on the proposed digital signage would not utilise colours and shapes (e.g. red, amber or green circles, octagons, crosses or triangles or shapes or patterns) that may result in the advertisement being mistaken for a traffic signal.
1	<i>"The lights from the proposed signage will blend in with the existing traffic lights at the intersection"</i> – Anonymous	It is also noted that the road network in this location is signposted as 40km/h High Pedestrian Activity Area. As such, motorists

Frequency	Submission Comment	Applicant Response
		<p>approaching the digital signage would have more time to observe and react to pedestrians crossing the road.</p> <p>For the reasons stated above, the proposal is unlikely to reduce the existing road safety for the roads in this location. Refer to the addendum Traffic Assessment prepared by TTPP at Attachment C.</p>
Residential Amenity		
18	<i>"We already have our lives impacted by the trains in the form of a train noise track, track works and station announcements. It feels extremely discourteous to now propose two large-illuminated signage as well."</i>	In response to these issues regarding residential amenity, the eastern sign has been removed from the proposal.
13	<i>"The signs will commercialise a residential area in a negative way".</i>	
4	<i>"The signs will affect many residents in surrounding residential properties, particularly the Regency Apartments."</i>	
2	<i>"The value of our property will be negatively impacted due to the proposed signage as it degrades the demand and attractiveness to live on this side of Help Street."</i>	
Inconsistency in documentation		
6	<i>"The application fails to mention that the proposed signs are located within a highly residential area within Chatswood."</i>	<p>As part of this response to submissions, the following addendum reports have been appended to this letter:</p> <ul style="list-style-type: none">• Addendum Lighting Report prepared by Lighting, Art & Science (Attachment B);• Addendum Traffic Assessment prepared by TTPP (Attachment C); and• Addendum Visual Impact Assessment prepared by Ethos Urban (Attachment D). <p>Refer to the documents appended to this letter for further details.</p>
2	The Regency Apartment building is incorrectly labelled as 2 Endeavour Street in the Evaluation of Lighting Impact Report.	
2	The VIA fails to assess the surrounding residential apartments, particularly the Regency Apartment building within the viewshed. The VIA clearly states that no consideration of the private domain or of night time impact including lighting.	
2	There is inconsistency of the signage placement within the documentation of the application.	
1	<i>"The photos that have been provided have been taken from the corner of Help & Orchard Streets, deliberately making it appear as if there are no residential apartments in the affected area."</i> – Resident of the Regency Apartment building	
Signage Content		
1	<i>"The signs on Help Street are being sold to us as going to supply information about train track works, timetable changes delays, etc. However, the reality is that it is a commercial decision and will include inappropriate content such as people in their underwear for a Bond's advertisement"</i> – Resident at Regency Apartment (Anonymous No. 26)	<p>A private operator will operate the content management system for the proposed advertising signage. This management system ensures that unapproved content is not downloaded either by mistake or without appropriate authorisation. The operator will implement content controls for the proposed signage, including:</p> <ul style="list-style-type: none">• no tobacco products• no overlay religious advertising• no advertising that contains overt and sexually graphic images• no pornography and illegal drugs.

5.0 Additional Environmental Assessment

From the submissions received, additional environmental assessment has been undertaken to respond to the matters raised. Where an environmental consideration is not included below, no further assessment or change from the assessment undertaken in the original SEE is required.

5.1 State Environmental Planning Policy No. 64 – Advertising and Signage

To address concerns raised by DPIE and Council further assessment against the applicable provisions of SEPP 64 are provided below, being:

- The objective in Clause 13(1)(a) that signage be compatible with the desired amenity and visual character of an area;
- Item 2 Schedule 1 – the proposal will detract from the amenity or visual quality of any ... residential areas;
- Item 4 Schedule 1 – the proposal will protrude above the bridge;
- Item 7 Schedule 1 – the illuminated sign will adversely affect safety of pedestrians and vehicles at the pedestrian crossings;
- Item 7 Schedule 1 – the illuminated sign will adversely affect the amenity of residential neighbours.

Refer to **Table 5** below for additional assessment of the proposed western sign against the relevant provisions of SEPP 64 as stated above.

Table 5 Additional SEPP 64 Assessment

Applicable Provision	Assessment
<p>13 Matters for consideration (1) A consent authority (other than in a case to which subclause (2) applies) must not grant consent to an application to display an advertisement to which this Policy applies unless the advertisement or the advertising structure, as the case requires— (a) is consistent with the objectives of this Policy as set out in clause 3 (1) (a), and</p> <p>3 Aims, objectives etc (1) This Policy aims— (a) to ensure that signage (including advertising)— (i) is compatible with the desired amenity and visual character of an area, and</p>	<p>The surrounding area is characterised by a highly urban mixed use setting that is defined by the high-density transit orientated development surrounding the railway and bus interchange. This character is underpinned by the existing concentration of commercial and retail land uses within the vicinity of the site and has essentially created Chatswood as a strategic centre, defined within the GSC's <i>North District Plan</i> and specifically notes in Planning Property N10 to be a place that attracts investment, business opportunities and jobs. The site is surrounded by high density-built forms and the signage is therefore considered compatible with the desired amenity and character of the area given its established urban framework and general density of employment and residential elements.</p>

Applicable Provision	Assessment
Schedule 1	
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 nearby residential buildings are located in an area that is characterised by a highly urban nature and features many high-density developments and infrastructure with high pedestrian, commuter and traffic flow. The existing amenity and quality of the visual character of the area has already been impacted by the intensification of land uses within the immediate area due to development of Chatswood as a strategic centre with dense employment and residential aspects. The signage is consistent with the existing visual character of a highly urban and strategic centre within Sydney's northern suburbs and will contribute to the visual interest of the immediate area in conveying Chatswood's role as a strategic economic centre. The existing rail corridor, with four rail lines (two heavy rail and two metro lines) has established a strong infrastructure corridor through the centre of the Chatswood area, and the addition of one sign within this existing corridor is consistent with the use of other infrastructure and transport corridors elsewhere in highly urbanised areas like Chatswood. Importantly, the proposed signage will comply with the illumination requirements under SEPP 64, and do not result in any acoustic impacts, unlike the existing rail corridor which exudes a high noise, vibration and visual impact on the immediate surrounding amenity.</p>
4 Streetscape, setting or landscape <ul style="list-style-type: none"> Does the proposal protrude above buildings, structures or tree canopies in the area or locality? 	<p>The proposed sign will not protrude beyond buildings, structures or tree canopies within the area. While the bridge itself is of an open style design, the adjacent tunnel component to the north provides for a solid façade which the proposed sign contributes to. The sign provides for a more solid bridge appearance, noting that it will not, however, protrude above the existing structural railings which form part of the bridge structure itself.</p>
7 Illumination <ul style="list-style-type: none"> Would illumination affect safety for pedestrians, vehicles or aircraft? Would illumination detract from the amenity of any residence or other form of accommodation? 	<ul style="list-style-type: none"> The sign has been subject to a comprehensive Road Safety Assessment prepared by TTPP which considers the signs proximity to the existing signalised traffic signs and found that an extended minimum dwell time of 15 seconds is considered to be suitable. As such, the illumination of the sign, as noted above and at Attachment B to be compliant with SEPP 64, is not anticipated to impact on safety for vehicles, pedestrians walking or aircraft. The proposed signage has been designed to minimise light spill by virtue of the backlit system being utilised. Additionally, the sign will not exceed the limitations provided by SEPP 64 as outlined in the Lighting Assessment at Attachment B, noting that the eastern sign which faced the Regency Apartments has been removed from the application.
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? 	<p>As assessed in the Road Safety Assessment by TTPP submitted with the original application and the addendum at Attachment C, the proposed sign is not considered to reduce the safety of any public road, pedestrians or bicyclists, noting the sign is located in a low speed, well sign-posted and line-marked areas, with clear directional signage and clearly marked pedestrian and cycle pathways.</p>

5.2 Transport Corridor Outdoor Advertising and Signage Guidelines

An amended compliance table is provided in **Table 6** against the Transport Corridor Outdoor Advertising and Signage Guidelines (the Guidelines) which addresses the Bridge Signage Criteria as requested by DPIE based on the revised proposal. The proposed development achieves general compliance with the requirements.

Table 6 Transport Corridor Outdoor Advertising Signage Guidelines Assessment

Guideline	Assessment	Compliance
Land Use Compatibility Criteria		
<i>The use of outdoor advertising in a given locality should not be inconsistent with the land use objectives for the area outlined in the relevant LEP.</i>	<p>The subject site is zoned as B3 Commercial Core under the Willoughby LEP 2012, with signage being a prohibited use in this land use zone. Notwithstanding, the proposed signage is permissible by virtue of Clause 16 of SEPP 64 as the site is a railway corridor (as described previously). Additionally, the proposed signage is consistent with the objectives of the B3 Commercial Core zone in that:</p> <ul style="list-style-type: none"> • The signage provides for advertising opportunities for local businesses; • As the signage can be used for emergency notifications this can enhance the ability of government agencies to publicise public safety matters; and • The signage will contribute to the standing of Chatswood as a commercial core by providing advertising space consistent with its strategic centre intent. 	✓
<p>(ii) <i>Advertisements must not be placed on land where the signage is visible from the following areas, if it is likely to significantly impact on the amenity of those areas:</i></p> <ul style="list-style-type: none"> • <i>environmentally sensitive area</i> • <i>heritage area (excluding railway stations)</i> • <i>natural or other conservation area</i> • <i>open space (excluding sponsorship advertising at sporting facilities in public recreation zones)</i> • <i>waterway</i> • <i>residential area (but not including a mixed residential and business zone, or similar zones)</i> • <i>scenic protection area</i> • <i>national park or nature reserve.</i> 	<p>The proposed signage will not be visible from any of the mentioned areas (noting that the residential uses to the east are zoned as B4 Mixed Use and the eastern sign has been removed from this application) and as such, would not cause any adverse impacts on the amenity of these areas.</p>	✓
<p>(iii) <i>Advertising structures should not be located so as to dominate or protrude significantly above the skyline or to obscure or compromise significant scenic views or vistas that add to the character of the area.</i></p>	<p>The proposed sign will not protrude above the skyline nor will it compromise any existing scenic views across the site given the sites location in a highly urbanised and built-up area.</p>	✓
<p>(iv) <i>Advertising structures should not be located so as to diminish the heritage values of items or areas of local, regional or state heritage significance</i></p>	<p>The proposed sign is not located within the vicinity of any heritage items, with the nearest heritage item being the Orchard Tavern located approximately 100m to the south-east of the site on the eastern side of the railway bridge (and therefore not visible from the western sign surrounds). The signage will not diminish any heritage values or significance within the site surrounds.</p>	✓
<p>(v) <i>Where possible, advertising structures should be placed within the context of other built structures in preference to non-built areas. Where possible, signage should be used to enhance the visual landscape. For example, signs may be positioned adjacent to, or screening, unsightly aspects of a landscape, industrial sites or infrastructure such as railway lines or power lines.</i></p>	<p>The sign is proposed to be affixed to an existing Rail Corp asset within a highly urban setting that will gain exposure to foot and vehicular traffic. The proposed signage also contributes to the screening of the rail corridor (including its railway lines) between its enclosed tunnel section to the north and the railway station to the south, providing a solid appearance.</p>	✓
Bridge Signage Criteria		

Guideline	Assessment	Compliance
(a) <i>The architecture of the bridge must not be diminished.</i>	The sign is designed to be directly integrated into the structural design of the bridge which is highly functional in its design. The signage is therefore not considered to compromise the architectural and visual quality of the bridge structure.	✓
(b) <i>The advertisement must not extend laterally outside the structural boundaries of the bridge.</i>	N/A. The sign will not extend laterally outside the structural boundaries of the bridge.	✓
(c) <i>The advertisement must not extend below the soffit of the superstructure of the bridge to which it is attached, unless the vertical clearance to the base of the advertisement from the roadway is at least 5.8m</i>	Complies. The advertisement does not extend below the soffit of the bridge to which it is attached and maintains the existing clearance requirement (which is sign posted at 4.6m) for the roadway below.	✓
(d) <i>On a road or pedestrian bridge, the advertisement must:</i> i. <i>not protrude above the top of the structural boundaries of the bridge</i> ii. <i>not block significant views for pedestrians or other bridge users (e.g. cyclists)</i> iii. <i>not create a tunnel effect, impede passive surveillance, or in any other way reduce safety for drivers, pedestrians or other bridge users</i>	Not applicable. The bridge is not a road or pedestrian bridge.	N/A
(e) <i>Paragraphs (a) to (d) above do not apply to the continuation of the display of any existing advertising on bridges approved prior to the gazettal of State Environmental Planning Policy No 64 (Advertising and Signage) (Amendment No 2) in 2007 for only one additional period under SEPP 64 Clause 14 if there is no increase in the advertising display area of the signage.</i>	Not applicable.	N/A
(f) <i>A DCP to display an advertisement on a bridge must be accompanied by a statement demonstrating how the advertisement will contribute to a public benefit. Section 4 outlines the public benefit test requirements.</i>	This application is not for a DCP. Refer to Section 5.6 of this letter which addresses public benefit.	✓
(g) <i>Any advertising sign proposed for development on a bridge over a classified road requires that construction drawings be submitted for review and approval by RMS bridge engineers prior to construction to ensure all road safety requirements are met.</i>	Noted and will comply.	✓
(h) <i>Any advertising sign proposed for development on a bridge over a road requires provision of a fall arrest system (sign and sign support structure to bridge) to ensure the sign will not detach in case of impact by an over high vehicle</i>	Noted. This will be developed as part of detailed design prior to construction.	✓
Digital Signs		
(a) <i>Each advertisement must be displayed in a completely static manner, without any motion, for the approved dwell time as per criterion (d) below.</i>	Complies. The visual display board will not facilitate any moving, flashing or non-static advertisements. It will be static and illuminated only.	✓
(b) <i>Message sequencing designed to make a driver anticipate the next message is prohibited across images presented on a single sign and across a series of signs.</i>	No message sequencing will be proposed. Each advertisement will be contained to one static slide only.	✓

Guideline	Assessment	Compliance
<p>(c) <i>The image must not be capable of being mistaken:</i></p> <ul style="list-style-type: none"> For a prescribed traffic control device because it has, for example, red amber or green circles, octagons, crosses or triangles or shapes or patterns that may result in the advertisement being mistaken for a prescribed traffic control device. As text providing driving instructions to drivers. 	No such imagery will be displayed as part of the advertising reel.	✓
<p>(d) <i>Dwell times for image display must not be less than:</i></p> <ul style="list-style-type: none"> i. 10 seconds for areas where the speed limit is below 80 km/h ii. 25 seconds for areas where the speed limit is 80km/h and over. 	The dwell time for image display will be limited to minimum of 15 seconds.	✓
<i>The transition time between messages must be no longer than 0.1 seconds, and in the event of image failure, the default image must be a black screen.</i>	Complies	✓
(e) <i>Luminance levels must comply with the requirements in Section 3 below.</i>	Complies	✓
(f) <i>The images displayed on the sign must not otherwise unreasonably dazzle or distract drivers without limitation to their colouring or contain flickering or flashing content.</i>	Complies. Advertising content will be managed so that there will be no opportunity for driver distraction.	✓
(g) <i>Any sign that is within 250m of a classified road and is visible from a school zone must be switched to a fixed display during school zone hours.</i>	N/A	N/A
(h) <i>Each sign proposal must be assessed on a case-by-case basis including replacement of an existing fixed, scrolling or tri-vision sign with a digital sign, and in the instance of a sign being visible from each direction, both directions for each location must be assessed on their own merits.</i>	Noted.	✓
(i) <i>At any time, including where the speed limit in the area of the sign is changed, if detrimental effect is identified on road safety post installation of a digital sign, RMS reserves the right to re-assess the site using an independent RMS-accredited road safety auditor. Any safety issues identified by the auditor and options for rectifying the issues are to be discussed between RMS and the sign owner and operator.</i>	Noted.	✓
(j) <i>Sign spacing should limit drivers' view to a single sign at any given time with a distance of no less than 150m between signs in any one corridor. Exemptions for low speed, high pedestrian zones or CBD zones will be assessed by RMS as part of their concurrence role.</i>	N/A.	N/A

Guideline	Assessment	Compliance
<p>(k) Signs greater than or equal to 20sqm must obtain RMS concurrence and must ensure the following minimum vertical clearances;</p> <ul style="list-style-type: none"> i. 2.5m from lowest point of the sign above the road surface if located outside the clear zone ii. 5.5m from lowest point of the sign above the road surface if located within the clear zone (including shoulders and traffic lanes) or the deflection zone of a safety barrier if a safety barrier is installed. <p>If attached to road infrastructure (such as an overpass), the sign must be located so that no portion of the advertising sign is lower than the minimum vertical clearance under the overpass or supporting structure at the corresponding location.</p>	<p>Noted. Concurrence with TfNSW has been sought as part of this application noting that TfNSW have responded requesting DPIE consider the relevant provisions of the Guidelines and SEPP 64.</p> <p>The sign is not located lower than the existing minimum 4.6m low clearance of the bridge.</p>	✓
<p>(l) An electronic log of a sign's operational activity must be maintained by the operator for the duration of the development consent and be available to the consent authority and/or RMS to allow a review of the sign's activity in case of a complaint.</p>	<p>Noted and will comply during operation.</p>	✓
<p>(m) A road safety check which focuses on the effects of the placement and operation of all signs over 20sqm must be carried out in accordance with Part 3 of the RMS Guidelines for Road Safety Audit Practices after a 12 month period of operation but within 18 months of the signs installation. The road safety check must be carried out by an independent RMS-accredited road safety auditor who did not contribute to the original application documentation. A copy of the report is to be provided to RMS and any safety concerns identified by the auditor relating to the operation or installation of the sign must be rectified by the applicant. In cases where the applicant is the RMS, the report is to be provided to the Department of Planning and Environment as well.</p>	<p>Noted and will comply once operation commences.</p>	✓

5.3 Visual Impact

An Addendum Visual Impact Assessment has been provided at **Attachment D**, which acknowledges that the eastern side of the rail line predominantly comprises residential uses. Given the commentary made by public submissions, the eastern sign has been removed from the application in response to the concerns raised relating to the residential uses. More broadly, the proposed western signage is perceived as part of the Chatswood centre, which is well known as a key, mixed use centre.

Sensitivity is considered low in light of the character and landscape of the visual setting. Land to which the proposal applies to is within Chatswood CBD, comprising a strong mix of high density land uses, centre on rail infrastructure bridge, with road infrastructure below (Help Street).

The magnitude of change is determined by assessing the scale of change against the duration and/or reversibility of the change. The magnitude of change caused by the likely effects have been assessed against the sensitivity of the setting which the DA is proposed to take place. As such, the magnitude of change is considered noticeable. The nature of the DA is expected within the built form context of CBD's, particularly positioned on road or rail bridge infrastructure.

Overall, the proposed western sign is considered to have low visual impact to the surrounding area and the removal of the eastern sign mitigates all potential visual impacts on the residential dwellings located to the east of the rail bridge.

5.4 Traffic

TTPP have provided a full response to submissions letter (located at **Attachment C**), which provides targeted commentary in response to the submissions raised by both DPIE and Council. The letter also provides specific case studies of existing digital signage locations and associated signage crash data analysis which addresses any pre-conceived links to digital advertising signs and distractions to road users. The aim of the analysis is to determine whether the digital signage at each location has resulted in any safety impacts to road users within the vicinity of the signage.

The analysis by TTPP assessed crash data that had been obtained from TfNSW at seven locations having digital signage owned by Sydney Trains. The crash data has been analysed to compare the number of crashes and severity of crashes for the same duration of time before and after the digital signage was installed.

The findings of the analysis suggest that existing digital signs do not cause distraction to road users which leads to road crashes. In fact, at all site locations, historic crash data indicates that there were a greater number of incidents recorded prior to the installation of each digital signage.

It is acknowledged by TTPP that the nature of the surrounding environment is characterised as being highly urbanised and the site location features an existing pedestrianised crossing as well as signalised traffic signs. The proposed digital signage facing west would be located approximately 46m before the stop line on approach to Railway Street. As such, motorists travelling eastbound towards the sign would be prepared to slow down when the downstream traffic signals change from green to amber and red, allowing motorists sufficient time to observe the road environment ahead in the presence of a digital signage without an increased risk of a vehicle-pedestrian collision.

It is also noted that the road network in this location is signposted as 40km/h High Pedestrian Activity Area. As such, motorists approaching the digital signage would have more time to observe and react to pedestrians crossing the road. In addition, the proposed digital signage would not display content that would contain shapes and colours that could be mistaken as an advisory sign and/or traffic signals (e.g. red, amber or green circles, octagons, crosses or triangles). This will allow the existing traffic signals at the Help Street intersection to be clearly distinguishable to motorists.

Based on the analysis presented in **Attachment C**, it can be concluded that, although there are various factors within the urban environment that require high driver attention and alertness, the perceived distraction potential for road users due to the presence of a digital signage is minimal, and is unlikely to result in creating a road environment that is any less safe for motorists, pedestrians, and cyclists than what currently exists, as driver alertness is required at all times regardless of the physical features of the urban environment

5.5 Lighting

An addendum lighting statement is provided by Lighting, Art and Science (refer to **Attachment B**) which provides further commentary on the impacts of illumination of the proposed signage. As outlined in the Lighting Report submitted with the original application, the site sits within Zone 2 in terms of luminance levels under the NSW Transport Corridor Advertising and Signage Guidelines. This requires maximum luminance levels at certain times of day. Currently, under SEPP 64, the maximum luminance levels allowable for digital signage is 350 cd/m².

The original report prepared by Lighting, Art and Science, submitted with the DA, included an assessment of the impact on nearby residences and traffic and as a result, the non-curfew luminance is proposed to be limited to 228 cd/m², (35% reduction to the 350 cd/m² allowable luminance level under SEPP 64) for the western sign.

It should be noted that these limits are based on a digital sign with variable content for a full white sign. The average luminance in reality and practice will be much less due to the graphics that will be associated with the design of the

sign. In addition, both the NSW Transport Corridor Advertising and Signage Guidelines and AS/NZS4282:2019 limit the period between changes in content to less than 10 seconds, so the sign cannot be used for any form of animation (this is also regulated by Digital Guidelines formulated by TfNSW, DPIE and the Outdoor Media Association for signage).

5.6 Public Benefit

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.

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 the Sydney CBD and potentially other substantial metropolitan stations (including Chatswood). 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, 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.

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:

- 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.

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 Greater Sydney.

We trust that the information above provided as well as the removal of the eastern sign allows DPIE to further progress their assessment of DA10662 and results in a favourable outcome for Sydney Trains. Should you require any further information regarding the proposal please do not hesitate to contact the undersigned.

Yours sincerely,



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