

Mr Greg Attewell
Sydney Trains
36-46 George Street
Burwood New South Wales 2134

12 March 2021

Dear Mr Attewell

Help Street, Chatswood Advertising Billboard Signage (DA 10662)

Request for Further Information

I refer to the above Part 4 development application at Help Street, Chatswood. Further to the Department's previous correspondence requesting a Response to Submissions (RtS) and identifying the need for additional information, the below issues have been identified and are required to be incorporated into your response.

Residential Impacts

The Department has further reviewed the proposal, Visual impact Assessment and Evaluation of Lighting Impact and is concerned with the following:

- 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).

Pedestrian and Driver Safety

The Department is concerned with the impacts of the proposal on both pedestrian and driver safety. In particular, the following needs to be addressed:

- 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.

- 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:

3.2.3 (a) The sign should not be located:

- less than the safe sight distance from an intersection, merge point, exit ramp, traffic control signal or sharp curves*
- 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*
- so that it is visible from the stem of a T-intersection.*

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.

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.

- 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.
- 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).

Outdated Plans

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.

Assessment Criteria

- 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.
- 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.
- 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.

Please ensure the abovementioned issues are addressed and provided as part of the Response to Submissions.

If you have any questions, please contact Tahlia Sexton on (02) 9860 1560 or email to tahlia.sexton@dpie.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to be 'T. Gizzi'.

Teresa Gizzi
Team Leader, Regional Assessments