

31 March 2021

2200249

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

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

Dear Cameron,

RE: RESPONSE TO SUBMISSIONS - DA 10661 for SEPP 64 ADVERTISING SIGNAGE PROPOSED AT WOODVILLE ROAD, GRANVILLE

This letter has been prepared by Ethos Urban on behalf of Sydney Trains in response to the submissions received for DA 10661 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.

During the exhibition period, a number of submissions were received by the relevant agencies including Transport for NSW (TfNSW), City of Parramatta Council and City of Cumberland Council, as well as one public submission. The DPIE, via email dated 9 February 2021, have requested the applicant provide a response to the submissions received. In accordance with DPIE's request, a formal response to the submissions received is provided in **Table 1** of this letter. This RtS is supported by the following documentation:

- Addendum Lighting Report prepared by Lighting Art & Science (**Attachment A**); and
- Addendum Heritage Response prepared by NGH (**Attachment B**).

1.0 Agency Submissions

There were 3 submissions made by public authorities, being TfNSW, City of Parramatta Council and Cumberland City Council. The key themes identified throughout these submissions relate to:

- Traffic and road safety; and
- Structural support concerns.

Importantly, TfNSW have granted their concurrence for the application.

Responses to each are outlined below in **Table 1** below.

Table 1 Response to Submissions

Submission Comment	Applicant Response
TfNSW	
The proposed signs design and operation shall be in accordance with the Transport Corridor Outdoor Advertising and Signage Guidelines 2017 requirements.	Noted. An assessment against the Transport Corridor Outdoor Advertising and Signage Guidelines was provided in the submitted SEE and found that proposed development achieves general compliance with the requirements as to minimise any risks on the surrounding road network as a result of the proposed development.
The images displayed on the signs shall not use: 1. Flashing or flickering lights or content	Noted and will comply. A private operator will operate the content management system for the advertising signage. This

Submission Comment	Applicant Response
<ol style="list-style-type: none"> 2. Animated displays, moving parts or simulated movement 3. Complex displays that hold a driver's attention beyond "glance appreciation" 4. Displays resembling traffic control devices by use of colour, shape or words that can be construed as giving instruction to traffic for example, red, amber or green circles, octagons, crosses, triangles and words such as 'stop' or 'halt' 5. A method of illumination that distracts or dazzles 6. Dominant use of colours red or green 	<p>management system ensures that unapproved content is not downloaded either by mistake or without appropriate authorisation. The visual display board will display content in feed cycles that are subsequently rotated on a loop cycle. Static digital advertisements will appear on the screen for a 30 second dwell time before changing to a new static digital image. There will be a 0.1 second transition time between images, which appears instantaneous. This is consistent with the Digital Guidelines formulated by TfNSW, DPIE and the Outdoor Media Association.</p>
<p>Dwell times between displays shall be no shorter than 30 seconds due to the close proximity to the existing Traffic Control Signals (TCS) on Woodville Road.</p>	<p>Noted and will comply. A 30 second dwell time will be adopted for these signs.</p>
City of Parramatta Council	
<p>Traffic Section 3.3.1 of the Transport Corridor Outdoor Advertising and Signage Guidelines 2017 states that the advertisement must not distract a driver from directional signs, traffic signals, prescribed traffic control devices, regulatory signs or advisory signs. It is considered that the applicant's assessment does not adequately consider the point that the placement of a sign should not distract a driver from directional signs and traffic signals. The size of the sign and the digital aspect of the signs are also factors not adequately considered the applicant's assessment.</p>	<p>The Road Safety Assessment submitted with this DA provides a full assessment of the positioning of the signs with regards to the Safe Stopping Distance (SSD) required by motorists. It was found that the northern sign would not be positioned within the SSD (being 70m prior to the signalised intersection). It was also found that the southern sign would be positioned within the safe stopping distance at the 60m mark, however when this was physically tested, it was found that even at the 60m mark, the southern sign is not visible to motorists due to the angle position of the sign in relation to the drivers line of sight within the vehicle and therefore the southern sign would be out of driving view (despite being positioned within the SSD). As such, motorists would not observe the southern digital advertising sign within the SSD of the signalised intersection on the Woodville Road south approach. In this regard, motorists would have sufficient reaction and braking time to stop safely on approach to the signalised intersection. Refer to the Road Safety Assessment submitted with the DA for a full assessment with figures to support the above.</p>
<p>Northbound Direction The following conflict point have been identified to be in close proximity to the proposed advertising sign for northbound traffic on Woodville Road:</p> <ol style="list-style-type: none"> 1. The Interchange Sequence Sign located approximately 17m from the proposed advertising sign. <p>The following points from the Road Safety Assessment for northbound traffic are considered to be not an accurate assessment of the impact of the proposed advertising sign:</p> <ol style="list-style-type: none"> 1. In regard to the interchange sequence signs, the report Road Safety Assessment claims that the advertising sign will not obstruct the drivers view. However, although the advertising sign is not physically obstructing the existing sign, it is still in very close proximity and may cause an information overload for the driver causing them to miss key information regarding the approaching road environment to allow them to safely navigate the road. 2. It is also noted that this area carries a high volume of traffic across the majority of the day and there is often queued traffic. The installation of an advertising sign at this location may cause the driver to be distracted by the advertising which may result in contributing to rear end collisions 	<p>The southern sign (facing northbound traffic) is not expected to have an impact on a drivers ability to decipher the Interchange Sequence Sign as it is on the opposite side of the road and does not overlap the viewshed in which both signs exist within.</p> <p>We acknowledge that this intersection does experience some traffic queuing from time to time, as observed when on site and identified within the road safety assessment, however driver sight lines to the cantilever traffic lantern are already obstructed by the rail bridge columns and there are existing 'Prepare to Stop' flashing cautionary lights in this location on the south approach to warn motorists of the already obstructed view of the lights. As such, and as assessed in the Road Safety Assessment, the digital signage is not considered likely to cause a driver additional distraction as there are already</p>

Submission Comment	Applicant Response
<p>Southbound Direction</p> <p>The following conflict points have been identified to be in close proximity to the proposed advertising sign for southbound traffic on Woodville Road:</p> <ol style="list-style-type: none"> 1. The traffic signals at the intersection of Woodville Road and Crescent Street located approximately 50m from the proposed advertising sign 2. The Parramatta Road exit ramp onto Woodville Road (southbound) located approximately 130m from the proposed advertising sign. <p>The following points from the Road Safety Assessment for southbound traffic are considered to not be an accurate assessment of the impact of the proposed advertising sign:</p> <ol style="list-style-type: none"> 1. For the traffic signals, the Road Safety Assessment states that the advertising sign will not be within the Stopping Sight Distance of the southbound traffic toward the traffic signals at the intersection of Woodville Road and Crescent Street. This point from the report is noted; however, this may cause the driver to be distracted by the advertising and to miss the traffic signals. 	<p>existing cautionary measures in this location. Additionally, TfNSW have proposed a 30 second dwell time for these signs.</p> <p>As mentioned above, the northern sign was found within the Road Safety Assessment to not be positioned within the SSD (being 70m prior to the signalised intersection). The SSD is calculated based on the existing speed limit of the road being signposted at 60km/h and thus (according to Austroads) the minimum safe stopping sight distance for a 60 km/h speed zone is 64m.</p>
Cumberland City Council	
Visual Impact on residents south of the bridge	<p>The proposed sign does not directly face any residential properties within 50m. Any visual impact from the southern sign is considered to have a low sensitivity (as assessed in the submitted VIA) as the main visual receptors will be people travelling in vehicles. The orientation of existing dwellings does not have a direct interface to the signs and levels of illumination will be compliant with the relevant Australian Standards for outdoor lighting and also those for advertising as imposed by the criteria set out in SEPP 64.</p>
Proposed extra support at the eastern side due to the signages' orientation to oncoming traffic and the land ownership of the land beyond the retaining wall east of the bridge (see Structural Feasibility Statement Section 'Recommendations')	<p>The sign will be supported by a structure cantilevered system that will be affixed to the existing railway overpass structure. The sign is supported by structural engineering advice prepared by Northrop who have confirmed that the bridge can support the weight of the sign and its associated operating systems. Additionally, it is not considered unusual for signs of this type and structural support system to be installed on similar infrastructure. Lastly, detailed structural engineering plans will be prepared prior to Construction Certificate.</p>
<p>Owner's consent</p> <p>The plan and elevation details of the development indicate that the footing of the north bound sign is located within an elevated road reserve adjacent to the eastern side of Woodville Road. As this is a road reserve, Cumberland Council would be the owner of this land. It does not appear that Council's consent has been obtained for the development with respect to the above road reserve based on the documentation available on the Department's Major Projects web page. Clarification on the owner's consent for the road reserve is required.</p>	<p>Granville Road is a State Controlled Road, therefore under management and ownership of TfNSW. It is requested that DPIE ensure the description of the proposal is updated to reflect this. It is also noted that TfNSW have issued their concurrence for the application under s138 of the <i>Roads Act 1993</i>.</p>
<p>RMS approval</p> <p>Council's Assets Management section notes that that the above road reserve is supported by a retaining wall, which is the responsibility of the RMS. Any proposed works within the road reserve may potentially impact the structural integrity of the wall and therefore, approval from the RMS should also be</p>	<p>It is unlikely that the works will affect the existing retaining wall. Nonetheless, if works are required to rectify any structural component of the retaining wall (only if necessary) permission will be sought from RMS to undertake any works. This will be determined through the detailed design phase. It is noted that</p>

Submission Comment	Applicant Response
acquired. Clarification on the RMS approval for the works on the retaining wall is required.	TfNSW have issued concurrence for the application under s138 of the <i>Roads Act 1993</i> .

2.0 Public Submissions

Only one public submission was received from a nearby landowner with relation to the proposed signage. The key themes raised within the submission was:

- Road safety;
- Heritage impacts;
- Visual impact of the sign; and
- Illumination impact of the sign.

A response to each of the above topics outlined within the public submission are outlined below in **Table 2**.

Table 2 Response to Public Submissions

Submission Comment	Applicant Response
Road Safety	
The drivers on Woodville road need to focus particularly on this stretch of road as it is a very narrow underpass and drivers need to take extra care not to jump the kerb and hit pedestrians and need to focus on staying within the lanes to cross it. This proposed digital sign would distract the drivers focus on staying within their lanes.	It is worth noting that due to the high level positioning and angle of the sign, by the time drivers approach the dip in the road to travel beneath the underpass, the signage will be outside of drivers views.
<p>There are three major blind spots:</p> <p>1) road curvature, drivers have to negotiate a bend at 60km/hr prior to reaching the underpass southbound on Woodville road. In the meantime, the drivers have to be cautious of traffic ahead, traffic merging in from left lane and right most lane tends to be blocked by vehicles turning right into Crescent Street which causes a lot of right lane vehicles trying to avoid the blockage and abruptly changing into the middle lane. Also traffic lights are part of the obstacles that drivers have to be aware all this happening in a short span of time and distance. As described this is a very chaotic and hazardous stretch of road. A super size digital screen will capture the drivers attention at the most critical time.</p> <p>2) The existing underpass bridge causes a partial blind spot for the road conditions ahead. Whilst vehicles pass under the bridge, there is no safety shoulder areas available and no room for errors or breakdowns.</p> <p>3) The super size digital sign proposal will fully block view of traffic ahead for vehicles approaching the bridge. The introduction of the sign will no longer have visual critical existing queues to allow road users to know what traffic conditions lie up ahead of the bridge. This will fully remove a significant safety aspect when travelling on the road</p>	It was found within the submitted Road Safety Assessment completed for this site that the signs are appropriately positioned outside of the safe stopping distance (with the exception of the southern sign which was found to have a negligible impact on drivers within the SSD at the 60m mark due to the proposed angle and position of the sign). It is important to note that precedents for this type of signage exist within the LGA, and in addition there are existing cautionary 'prepare to stop' lights that exist in this location for the northbound approach. The signs have been subject to an extensive detailed road safety analysis which suggests that the installation of digital signage at the site would be acceptable.
Right-turning vehicles from Hallsal street onto Woodville road to head north bound will be blinded and distracted from the super size digital screen and road reflections cause by the screen during wet conditions. This particular	The illumination will be fully compliant with the relevant Australia Standards for outdoor advertising lighting and will operate in compliance with the lux requirements as stated in Schedule 1 of SEPP 64.

right turn has had a notorious history of numerous accidents	
Heritage Impact	
The government paid a heritage officer to make these houses and other surrounding houses and landmarks heritage. Now the government, for the sake of advertising revenue, are happy to compromise the significance of the heritage items at any time they like to their discretion.	<p>Section 2.3.1 of the NGH (2020) SOHI acknowledges that the Conjoined Residences (Parramatta LEP 2011, Listing ID: I214) and Single Storey Residence (Parramatta LEP 2011, Listing ID: I215) are within vicinity (41m south and 65m south from the project area respectively) to the project area and have therefore been assessed within the SOHI report.</p> <p>Section 4 of the NGH (2020) SOHI assesses that whilst the Single Storey Residence is of aesthetic significance as an example of a single storey Victorian residence constructed of sandstone bricks, curved iron roofing, and other materials, no specific views to and from the site have been identified as being of heritage significance. The NGH (2020) SOHI report outlined that no aesthetic significance was identified in relation to the Conjoined Residences site.</p> <p>NGH notes that Section 5 of the NGH (2020) SOHI report specifically addresses the development proposal and the potential heritage impact the proposed works will have on surrounding items of heritage significance. It has been assessed within the report that there will be no physical or visual impacts to the surrounding heritage items.</p> <p>It was noted within the SOHI report that the report follows the Heritage NSW publication Statements of Heritage Impact (2002) and Heritage NSW publication Assessing Heritage Significance (2001) guidelines. The SOHI report outlines that the additions will not visually dominate the surrounding heritage items, and the public and users of the item will still be able to view and appreciate its significance.</p>
Visual Impact	
<p>1. As residents our views and vistas of Parramatta road junction will be blocked and compromised by an annoying digital super screen changing every 15 seconds.</p> <p>2. The digital lights will produce annoying visual light and noise effecting our amenities in our windows and on our verandah</p>	Its important to establish that no significant or iconic views currently exist or are impacted as a consequence of the proposed signs. The signs are proposed on an existing railway overpass and therefore will not obstruct any perceived vistas from the subject property. The digital signs will be illuminated to levels consistent within the requirements in the relevant Australian Standards for outdoor lighting and under Schedule 1 of SEPP 64. TfNSW have provided that the signage dwell time must be no less than 30 seconds.
Sound	
No consideration whatsoever in the filed reports included the noise impacts. The digital advertising super sign forms are vast in scale and would create a reflective sound amplifier that will add further reflective vehicle noise and road noise to the residents and surrounding area.	The proposed sign is situated above a heavily trafficked road and within an existing high volume rail corridor which contribute to overall background noise levels within the area. No further consideration is necessary.
No mention whether the sign will utilise audio to advertise	No audio will be used to advertise. No speakers or acoustic devices are proposed as part of the sign design.
Pollution / Air Flow Impacts	
The advertising sign will form an air barrier that will reduce fresh air flow to the residents and surrounding area causing further air pollution to stagnate. The existing underpass road is in the form of a bowl shape which is below ground level where air settles. The only relief of stagnate air is provided by ground level fresh air flow to be unobstructed	There is no evidence to support this claim that the proposed signage would adversely impact fresh airflow. Additionally, the road corridor in this location is subject to high volume traffic and thus is preliminarily considered that airflow would be high in this location.
Illumination impacts	

This road is lit by yellow night fog lights to assist drivers to visually see better on a foggy or smoggy night. This area is prone for such conditions. The proposed street signs will have adverse effect on drivers visibility increasing safety risk. The screen will render the yellow fog lights ineffective and reduce visibility at critical weather conditions	The boards will be presented as static images that are backlit via LED devices controlled by the standards regulated under the relevant Australian Standards and those within Schedule 1 of SEPP 64.
No study conducted on the suns potential glare reflective adverse effects on drivers from the proposed screens.	The illumination levels have been considered in terms of both day time and night time operation, and will operate in compliance with the relevant Australian Standards for outdoor lighting and the illumination levels required under Schedule 1 of SEPP 64.
The super digital screen changing colours/images every 15 seconds will cast a colour lighting in the area which will affect the look and feel of the area. The area will become a visual noise eyesore	The screen will change displays every 30 seconds and will not result in any inappropriate light spill to surrounding areas. They will be presented as digital display boards that are internally backlit and illuminated via LED devices.
Electromagnetic Radiation	
There is no indication mentioned if the proposed communications to the digital display screens will use 5G or any other high powered electromagnetic radiation with potential harmful effects to human or local species health.	The signs will operate via an industry standard connectivity system to enable uploading of display imagery as required.
Security	
The southern super size digital screen, right-most side structure of the screen sits on a green space. The green space area is fenced off to public by a waist high fence. Vandals have struck the overpass bridge several times that is evident by the existing graffiti and vandalism. It would take no effort for vandals to get easy access to the super screen, use it as a hiding place, cause crime, vandalism, graffiti or endanger road users below. Where are the safety measures to secure this site? None of the proposed documentations to date have any security safety procedures documented	The signs will not be accessible to any members of the public with details of security devices to be developed during detailed design.

3.0 Additional Environmental Assessment

From the agency 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.

3.1 Lighting Impact

Lighting, Art + Science (LAS) have prepared an addendum response to address concerns regarding lighting and illumination which is provided at **Attachment A**. The addendum response focusses on responding to the issues raised in the public submission which address lighting, including the impact of illumination during sensitive hours to nearby residences, addresses any glare that may be caused by the sign, and the colour of night lights for driving safety.

The response includes a Threshold Increment Analysis which recommends maximum luminance thresholds for pre-curfew period (sunset to 11pm) and the curfew period (11pm to dawn), which have been proposed for this DA at 173cd/m² for the pre-curfew period and 114cd/m² for the curfew period to mitigate any illuminance limits on residences. It is important to note that these thresholds for the curfew periods have been created uniquely to respond to the surrounding environmental context and are well below the maximum allowable standards presented under the Guidelines as well as SEPP 65.

LAS have also undertaken a review of existing signs in the area to quantify and assess the existing illumination levels of conformance, as it appears to be affecting people's pre-conception of the actual impact of illumination. LAS

have measured the white component of the existing signs (as this is the most accurate reading that can be used for a measurement for conformance of a digital sign with variable content). A full assessment of existing signs is provided in **Attachment A** and include specific details of the signs including illuminance levels, variable content details, the dwell time limit and the ability of the sign to switch to 'night mode'.

Refer to **Attachment A** for a full response to the abovementioned concerns.

We trust that the information provided in this response addresses the matters raised by DPIE and the community and allows the planning assessment to proceed. The response provided in **Table 1** and **Table 2** as well as the additional information provided addresses the requirements raised by DPIE in their email dated 9 February 2021.

Yours sincerely,



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